



SDMS DocID

2228543

April 19, 2012

BY OVERNIGHT MAIL

Mr. Kenneth I. Rose, III
Financial Analyst (3HS62)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Required Submission of Information
Metro Container Site, Trainer, Pennsylvania

Dear Sir:

This letter will serve as the response of Zenith Products Company ("Zenith"), 400 Lukens Drive, New Castle, Delaware to the March 9, 2012 letter of Joanne Marinelli regarding the above-referenced site.

INTRODUCTION

Initially, Zenith would note that it does not have the same ownership or management as the entity which sent what Zenith understands to be empty drums to the Metro Container facility for reconditioning or destruction during a period in the middle 1980s. The entity involved in that action was either a C Corporation owned by Joyce E. Roggio, A. James Aruffo and several small minority owners or a Subchapter S Corporation owned by eight employees. That entity was then transferred to Zenith Acquisition Corp., a corporation owned by Masco Corporation ("Masco"), a publicly held corporation, on or about February 28, 1994. Thereafter, Zenith Products was operated as a wholly-owned subsidiary of Masco until late in 2005 when the present majority owner and several minority owners of Zenith Products Corp. purchased the stock in the wholly-owned subsidiary from Masco.

The present Zenith has between seven and ten employees who may have worked at the former Zenith's Aston location at the time when drums were sent by the former Zenith entity to the Metro Container Trainer location. Those individuals do not have personal knowledge of the drums, their contents, the 1980s' manufacturing processes, procedures related to the cleaning and handling of the drums, or the production at the Aston facility in the 1980s which may have required raw materials in drums during the manufacturing process or produced any waste materials which were placed in drums. In addition, the Aston facility was sold to Zenith Acquisition in February of 1994.

There was an earlier Section 104(e) request to the former Zenith entity at the Aston facility in 1988. A copy of the response to the request is attached hereto, along with copies of the documents that were in the prior file. To date, despite several searches under the

author's direction, Zenith has not located or obtained any further knowledge or records regarding additional communications regarding the Metro Container site or the materials sent to the site, except for the materials in the attached file. The person who signed the response, Briggs Pletcher, left Zenith in approximately January of 1999. He has no current relationship with Zenith and does not receive retirement or other continuing payments or benefits from Zenith. The only officer who has been employed at each of the Zenith entities since 1986 is Thomas Della Franco. He has only served in financial jobs and is presently the Chief Financial Officer. Since 1986, Zenith Products Company has gone through three separate ownership and management changes and has done a complete relocation of all of its physical operations from Aston, Pennsylvania to New Castle, Delaware.

RESPONSES

Zenith's responses to the specific inquiries in the March 9, 2012 letter are as set forth below. Zenith's Introduction is incorporated into each response.

1. EPA has information which indicates that you sent drums to the Metro Container Site between 1980-1988 from one or more of your facilities. For each such facility, identify:
 - a) the address of the facility; and
 - b) the products/materials produced at such facility between 1980-1988.

RESPONSE: The address of the former Zenith location is 200 Commerce Drive, Aston, Pennsylvania. It is the understanding of the present employees of Zenith that the Aston location produced metal and plastic bathroom products between 1980 and 1988. The current Zenith employees have no personal knowledge of this.

2. Identify the processes used between 1980-1988 to produce the products/materials identified in response to Question #1.

RESPONSE: The present employees of Zenith have no personal knowledge of the processes or raw materials used to produce the products

3. Identify the raw materials used in the processes identified in response to Question #2.

RESPONSE: The present employees of Zenith have no personal knowledge of the processes or raw materials used to produce the products

4. Identify all wastes and by-products generated between 1980-1988 from the processes identified in response to Question #2.

RESPONSE: The present employees of Zenith have no personal knowledge of the waste and by-products generated by the processes.

5. For each raw material and waste/by-product identified in response to Questions #3 and #4:
 - a) Identify the chemical composition.
 - b) Provide a copy of all documents referring to or related to the composition of such raw material and waste/by-product including, but not limited to, chemical analyses performed on such raw materials and wastes/by-products; and
 - c) Identify how each waste/by-product was disposed of between 1980 and 1988.

RESPONSE: See Responses 3 and 4.

6. Identify all chemicals/constituents that would have been present in drums present at any time between 1980-1988 at the facilities identified in response to Question #1(a).

RESPONSE: Zenith has no records and no individuals with personal knowledge of this subject.

7. Identify, and provide a copy of, all contracts and agreements between you and Metro Container Corporation or any related entity under which drums were sent from your facilities to the Metro Container Site (your answer need not identify documents evidencing individual shipments of drums to the Site).

RESPONSE: Based on Mr. Pletcher's prior response and the attached documents, it is Zenith's understanding that any drums sent to Metro Container in the 1980s were empty and that they were verified to be empty by employees of Zenith and Metro Container.

8. Identify the procedures used to determine which drums present at any time at your facilities would be sent to the Metro container Site.

RESPONSE: It is Zenith's understanding, based on Mr. Pletcher's response and the attached records, that empty drums were sent for reconditioning or destruction.

9. Identify the chemicals/constituents contained in the drums you sent to the Metro Container Site.

RESPONSE: See Responses 7 and 8.

10. If you assert in response to Question #9 that some or all of the drums sent to the Metro Container Site were empty, identify the chemicals/constituents that would have been in the drums before they were emptied.

RESPONSE: See Responses 6 through 9.

11. Provide the name, title, address, and telephone number of the person answering these questions on your behalf. For each question, provide the name, title, area of responsibility, current address, and telephone number of all person consulted in preparation of the answers.

RESPONSE: See the Introduction to this Response. This letter is being forwarded by the undersigned, but there is no person at Zenith with personal knowledge or records adequate to allow a further response.

12. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a) Your document retention policy;
 - b) A description of how the records were/are destroyed (burned, archived, trashed, etc.);
 - c) The approximate date of destruction;
 - d) A description of information that would have been contained in the documents; and
 - e) The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

RESPONSE:

- a) The current owners of Zenith Products maintain whatever environmental records that they have concerning the former Aston location, but do not know whether all such records were maintained by the prior ownership and management before 2005. The three prior owners may have had various records retention policies.
- b) – e) It is Zenith's understanding that all records in reference to the 1988 response to the Section 104(e) request were preserved. Zenith also contacted Masco and they informed Zenith that they had an identical set of responses. John Cullen, Director Health Safety Environmental at Masco in Taylor, Michigan was the person with knowledge of these records.

13. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information that you provide in a response to this request should include the party's name, address, type of business, and the reasons why you believe that the party may have contributed to the contamination at the Site or may have information regarding the Site.

RESPONSE: Mr. Cullen is identified in Response 12. Zenith Products Company does not have a last known address for Mr. Pletcher.

Please contact the undersigned if you have any questions or require further information, to the extent such information may be available.

Sincerely yours,



Terry Douglas
President, Zenith Products

/1056015

Attachments

Attachments

1. Response to Section 104(e) request
2. Documents from prior file

April 20, 1988

Mr. Lawrence Falkin
U.S. E.P.A., Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia PA 19107

Dear Mr. Falkin:

In response to EPA letter dated April 12, 1988 we submit to you the material enclosed.

- 1) Zenith Products has had no hazardous substances transported to, or disposed of at, Metro Container Corp.
- 2) Zenith Products has had approximately 600 empty 55 gallon drums transported from Zenith Products to Metro Container Corp by Metro Container over the last 2½ years. Drums were basically sold to Metro for reconditioning.
- 3) Shipments to Metro Container and receipts from Metro are documented in the attached information.
- 4) No correspondence occurred between Zenith Products and any regulatory agency regarding the drums sold to or removed by Metro Container Corp.
- 5) There exists no written correspondence between Zenith Products and Metro Container Corp. other than those documents attached.
- 6) There has been no third party involvement in the relationship between Zenith products and Metro Container Corp.
- 7) Zenith Products has no real interests in the properties occupied by Metro Container Corp.
- 8) Drums were sent to Metro Container largely for reconditioning, except as where noted; some drums were sent to Metro Container for crushing and burning.

Mr. Lawrence Falkin
April 20, 1988

Page 2

Zenith Products is not privately insured against releases of hazardous wastes or substances as a result of handling of such material.

I have made all efforts possible to accumulate documents pertaining to Metro Container Corp. If further information is requested please contact me directly.

All drums removed by Metro Container were inspected by Zenith personnel and Metro Container Personnel to verify there was no residual substances contained within them. Prior to removal drums contained raw materials such as: Paint, Oil, Electroplating, Chemicals and Solvents.

Zenith Products wishes to assist in the gathering of any information requested. We also would like to retain operational anonymity in public view, where possible.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Briggs Pletcher', written over a horizontal line.

Briggs Pletcher
Assistant Engineering Manager

/jrl

(216) 586-6598

Jack L ~~itner~~ BP Lawyer

D. Pout

PRP → explore putting
it together

D. Pout Host

Tues 6/21 Wilmington
10:00

1007 Market St

Pan Meitner's Office

Room 7015A
(302) 774-8720

Wade
Pout

302-586-6598

Wade Meitner

Meitner
Pout
Carpenter
Bryant

EPA will issue another
order.

Larger Companies won't

let Metro get away
from clean up

Use Seper lein



U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
INVESTIGATIONS

SUSAN S. HELBERT
SPECIAL AGENT

841 CHESTNUT STREET
13TH FLOOR
PHILADELPHIA, PA 19107

(215) 597-9421
FTS: 597-9421

Approx 1,000,000 Drums

currently ident. possible.

Estimated Clean up

\$ 2,000,000

Major
Cause of
problem → We found
650 Openhead drums
240 Closedhead
150 Screws
= 1040 Drums

Our Contribution(?)

\$500 to \$2000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

JUL 19 1993

Zenith
A. James Aruffo
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014

Re: Metro Container Confidentiality Claims

Dear Mr. Aruffo:

The Environmental Protection Agency (EPA) has received a request to review certain records pertaining to the Metro Container Site; however, before the site file will be made available to the requestor, all claims of business confidentiality must be resolved.

EPA's records indicate that you have asserted a business confidentiality claim covering some of the Metro information, which you provided to EPA pursuant to 1988 and 1991 CERCLA Section 104(e) Information Requests; however there are no records regarding the resolution of your claim. At this time it is not clear if you intended your claim to cover the whole response or a part of the response, or if you subsequently withdrew or substantiated your claim.

This letter is to notify you that the Office of Regional Counsel at EPA Region III will be making a final confidentiality determination concerning the Metro information. Please respond within 30 working days of your receipt of this letter clarifying the status of your claim. If you have already substantiated your confidentiality claim, please submit copies of the relevant documentation to EPA.

If you have not substantiated your claim and you feel that some or all of the information you submitted is entitled to confidential treatment, please specify which portions of the information you consider confidential. Please be specific by page, paragraph, and sentence when identifying the information subject to your claim. For each item or class of information that you identify as being subject to your claim, please comment on the following issues:

1. The period of time for which confidential treatment is desired, e.g. until a certain date or until the occurrence of a certain event, etc.;

7/22/93 - Discussed with TBL - "Do not respond"
no legitimacy to claim of confidentiality.

2. Measures you have taken to guard against undesired disclosure of the information to others;
3. The extent to which the information has been disclosed to others and the precautions taken in connection therewith;
4. Whether there are pertinent confidentiality determinations by EPA or other federal agencies. If so, enclose a copy of any such determinations;
5. Whether you assert that disclosure of the information would be likely to result in substantial harmful effects to your competitive position. If so, explain the nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects (generally including the manner in which a competitor would use the information);
6. Whether you assert that the information is "voluntarily submitted" as defined at 40 C.F.R. 2.210(i). If so, explain how disclosure would tend to reduce EPA's ability to obtain similar information in the future;
7. Any other issue you deem relevant.

Please note that you bear the burden of substantiating your confidentiality claim pursuant to 40 C.F.R. 2.208(e). Conclusory allegations will be given little or no weight in the determination. If relevant facts necessary to the substantiation are themselves confidential, please identify them as such so EPA may maintain their confidentiality pursuant to 40 C.F.R. 2.205(c). In the absence of such identification, your comments will be available to the public without further notice to you.

Your comments must be postmarked or hand delivered to this office by the 30th working day after your receipt of this letter. You may seek an extension of time to submit your comments, but the request must be made to the Office of Regional Counsel, Region III, before the end of the 30-day period. Except in extraordinary circumstances, no extension will be made without the permission of the requester. Failure to submit your comments within that time will be regarded as a waiver of the confidentiality claim, and EPA will be free to release the information.

Should you have any questions regarding this matter, please
call me at (215) 597-9866.

Sincerely,

Catherine McCool

Catherine McCool
Senior Paralegal Specialist



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

APR 12 1988

In Reply Refer to: 3HW14

Zenith Products
A. James Aruffo
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014

Re: Metro Container Corporation Site

Dear A. James Aruffo:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), you are requested to furnish all information and documents in Zenith Products's possession, custody, or control, or in the possession, custody, or control of any of Zenith Products's officers, employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), including but not limited to empty unwashed 55 gallon drums or other containers which Zenith Products generated, transported, disposed of, or arranged for transportation or disposal of at the Metro Container Corporation or Metro Enterprises Container Corporation or Universal Container Corporation at Second and Price Streets, Trainer, PA 19013 (the "Site").

All information and documents requested are due to the address listed below within ten (10) calendar days of receipt of this letter.

The response should include, but not be limited to, information and documentation concerning:

1. The types and quantities of the hazardous substances generated or transported by Zenith Products and sent to, transported to, or disposed of at the Site;
2. the quantities and residual contents of unwashed 55 gallon drums or containers which Zenith Products generated or transported and which were sent to, transported to, or disposed of at the Site, whether or not they contained hazardous substances;
3. the date(s) such substances and/or containers were sent to, transported to, or disposed of at the Site;
4. any correspondence between Zenith Products and any regulatory agencies regarding such substances and/or containers;
5. any correspondence between Zenith Products and Metro Container Corporation, Metro Enterprise Container Corporation, or Universal Container Corporation or any other third party regarding such substances and/or containers;
6. the identity of, and documents relating to, any other persons who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances and/or containers to the Site;
7. copies of any deeds, rights-of-way, leases, or other real interests which Zenith Products has or had in the Site; and
8. whether the substances or containers described above were sent to or transported to the Site for disposal, or reconditioning and return, or reconditioning and resale by Metro Container Corporation or Metro Enterprise Container Corporation or Universal Container Corporation.

Please describe any documents that were maintained by Zenith Products of the transactions with Metro Container Corporation or Metro Enterprise Container Corporation or Universal Container Corporation, including the date of the documents, the author of the documents, the current location of the documents and the current custodian, and all efforts that were taken to identify these documents.

In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all relevant insurance policies.

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality covering all or part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

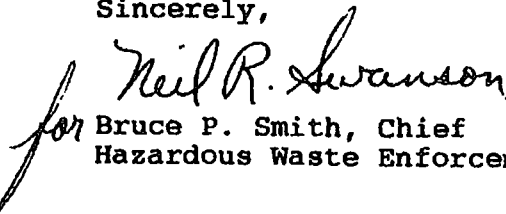
Please send the required information to:

Lawrence Falkin
U.S. Environmental Protection Agency, Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this matter, please contact Lawrence Falkin at (215) 597-6679.

Sincerely,


for Bruce P. Smith, Chief

Hazardous Waste Enforcement Branch



July 13, 1990

Ms. Susan Helbert
841 Chestnut Street
13th floor
Philadelphia, PA 19107

Dear Ms. Helbert:

Enclosed is a copy of all records we have pertaining to
Metro Container Corporation.

The records are in sequential date order.

If you have any questions you can contact me directly at
485-4700 (X245).

Sincerely,

A handwritten signature in dark ink, appearing to read 'Briggs Fletcher', is written over a horizontal line.

BRIGGS PLETCHER
Engineering Manager

Encl.
a/s

BP/amg

*7/13 Sent Fed. Ex. Copy of all our records
that are in "Metro File"*

200 Commerce Drive
Aston, PA 19014-3293

(215) 485-4700
SALES (215) 485-2685
FAX (215) 485-0187
TELEX #820845



July 25, 1988

Jeffrey A. Smith, Esq.
Clark, Ladner, Fortenbaugh & Young
32nd Floor
1818 Market Street
Philadelphia PA 19103

Dear Mr. Smith:

Thank you for your letter and Participation Agreement concerning the Metro Container Corporation.

We are very much impressed with your efforts to clean-up the hazardous waste site promptly and at economical cost. As the record indicates, we turned over to Metro only a very small amount of drums and even at a \$2 million dollar maximum estimate, based on a pro rate volume basis, our portion of the cost would be considerably below \$1000 dollars assuming we were involved in the cost at all.

Given these circumstances, we are wondering if it would be appropriate to send you the \$1000 dollars in advance that you requested.

In closing, please be assured that we are supportive of your work and do want to be considered as a cooperative corporation.

Kindly let us hear from you.

Very truly yours,


Robert Roggio
Executive Vice President

nmc

2AS:db

IN RE: GRAND JURY MATTER

United States District Court

EASTERN

DISTRICT OF PENNSYLVANIA

TO: Custodian of Records
Zenith Metal Products

SUBPOENA TO TESTIFY
BEFORE GRAND JURY

SUBPOENA FOR
PERSON AND DOCUMENTS

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date and time specified below.

PLACE

United States Courthouse
601 Market Street
Philadelphia, PA 19106

ROOM

G.J. Room

DATE AND TIME

July 1, 1990

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

See attached

This subpoena shall remain in effect until you are ordered to depart by the court or by an officer acting on behalf of the court.

By: *Michael E. Kunz*
MICHAEL E. KUNZ
DEPUTY CLERK



DATE

June 27, 1990

BY: DEPUTY CLERK

This subpoena is issued upon application of the United States of America

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY
Ronald A. Garachan, AUSA
23310 U.S. Courthouse, 601 Market St.
Philadelphia, PA 19106
(215) 597-2268

If not applicable, enter "none"

Form 27-1 (Rev. 10-80)

FD-27 (Rev. 1-77)

RAS:db

IN RE: GRAND JURY MATTER 90-176

United States District Court

EASTERN

DISTRICT OF PENNSYLVANIA

TO: Custodian of Records
Zenith Metal Products

SUBPOENA TO TESTIFY BEFORE GRAND JURY

SUBPOENA FOR:

☐ PERSON ☒ DOCUMENTS OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE United States Courthouse 601 Market Street Philadelphia, PA 19106	ROOM G.J. Room 4322
	DATE AND TIME Wednesday July 18, 1990 - 9:30 AM

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):*

SEE ATTACHMENT "A"

☐ Please see additional information on reverse

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK <i>Michael E. Kunz</i> MICHAEL E. KUNZ	DATE June 27, 1990
(BY) DEPUTY CLERK	



This subpoena is issued upon application of the United States of America

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY
Ronald A. Sarachan, AUSA
3310 U.S. Courthouse, 601 Market St.
Philadelphia, PA 19106
(215) 597-2268

*If not applicable, enter "none."

To be used in lieu of AO110

FORM OBD-277
JAN. 86

RETURN OF SERVICE ⁽¹⁾		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (NAME)		
SERVED BY		TITLE
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER ⁽²⁾		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;"> <p><i>Date</i></p> </div> <div style="text-align: center;"> <p><i>Signature of Server</i></p> </div> </div> <div style="text-align: center; margin-top: 10px;"> <p>_____ <i>Address of Server</i></p> </div>		
ADDITIONAL INFORMATION		

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal Rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

GJ90-176
(Drums)

ATTACHMENT "A"

For the period January 1, 1984 to the present:

1. All records concerning dealings with Metro Container Corporation ("MCC"), Metro Enterprise Container Corporation ("MECC"), AMF Trucking Company and/or AMF Drum Co., including but not limited to:
 - a. all records concerning drums recycled by, sold to, transferred to and/or delivered to any of the above companies, including but not limited to records reflecting the contents of drums, the source of drums and their contents, and invoices and payments for transporting, disposing of and/or recycling drums;
 - b. for each transaction identified in (a), above, records reflecting the identity of transporter, the date of pick-up of drums, the name of the driver, the make, model and VIN of the vehicle used to pick up the drums, the number of drums picked up, the contents of the drums, the date of return to your company and number of drums returned, the destination of any drums not returned;
 - c. all invoices from or to MCC, MECC, AMF Trucking Company, and/or AMF Drum Co. and all records reflecting the payments to or from any of these companies; and
 - d. all records concerning contents of the drums identified in (a) above at any time prior to sale, transferring and/or delivery to any of the above companies, including but not limited to prior to rinsing and/or preparation for recycling, including but not limited to Material Safety Data Sheets.
2. All records concerning dealings with Lewis Maslow and/or Sidney Levy and/or Albert Westfall.

RECEIVING RECORD

7164

Metro Cont. 485-6100

RECEIVED FROM <i>2 EN WITH METALS</i>			
ADDRESS <i>Ashton Pa</i>			
PURCHASE ORDER NO. OR RETURNED 00000		FREIGHT BILL NO.	
DATE <i>11-25-85</i>		PREPAID COLLECT	
VIA <i>#263 trailer</i>			
1	<i>95</i>	<i>Open</i>	<i>55 gallon drum @ \$3.00 #258</i>
2		<i>Heads</i>	<i>40 w/o Tops \$.50 - 40</i>
3			<i>218</i>
4			
5	<i>52</i>	<i>Closed</i>	<i>55 gallon drum @ \$2.00 #104</i>
6		<i>Heads</i>	
7			<i>#322</i>
8			
9			<i>total drums</i>
10	<i>147</i>		
11			<i>0 RUMMS HAVE to be</i>
12			<i>Inspected</i>
REMARKS: CONDITIONS, ETC. <i>D. J. Porter</i>			
NO. PACKAGES	WEIGHT	RECEIVED BY <i>Firm</i>	CHECKED BY
		DELIVERED TO	

Radiform®
2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE

RECEIVING RECORD

7378

METRO CONTAINER

RECEIVED FROM Zewith METAL			
ADDRESS Highland Ind Park			
PURCHASE ORDER NO. OR RETURNED 00000		FREIGHT BILL NO.	
DATE 12-27-85		PREPAID COLLECT	
VIA T-166			
1			
2	48		55 gal Bung Dura
3			
4	40		55 gal Open Head
5			
6			
7			count + ship due
8			
9			
10			
11			<i>[Signature]</i>
12			
REMARKS: CONDITIONS, ETC.			
NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY
DELIVERED TO			

Rediform®

2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE

RECEIVING RECORD

8209

RECEIVED FROM		<i>ZENITH PRODUCTS</i>	
ADDRESS			
PURCHASE ORDER NO. OR RETURNED GOODS		FREIGHT BILL NO.	DATE <i>3/20/86</i>
VIA		PREPAID	COLLECT

QUANTITY	ITEM NUMBER	DESCRIPTION
1	<i>20</i>	<i>RAW HF</i>
2		
3		<i>12 - ARCO</i>
4		<i>2 - MOBIL</i>
5		<i>5 - BP</i>
6		
7		
8		
9		
10		
11		
12		

REMARKS: CONDITIONS, ETC.

[Signature]
RECEIVED
MAR 19 1986
METRO CONTAINER CORP.

NO. PACKAGES	WEIGHT	RECEIVED BY	UNPACKED BY	EXAMINED BY
--------------	--------	-------------	-------------	-------------

Form 1
 1-77

ALL INFORMATION CONTAINED
 HEREIN IS UNCLASSIFIED
 DATE 10/10/01 BY 1043

RECEIVING RECORD
 METRO Containers 7170
 215-485-6100

RECEIVED FROM <i>Zenith</i>		ADDRESS <i>Aston Pa</i>	
PURCHASE ORDER NO. OR RETURNED GOODS		FREIGHT BILL NO.	DATE <i>6-9-86</i>
VIA <i>#5-45</i>		PREPAID	COLLECT
QUANTITY	UNIT	DESCRIPTION	
1	17	55	gal H.F.
2			
3	2	55	gal Open Heads
4			
5			
6	19		total
7			
8			
9			DRUMS HAVE TO BE
10			INSPECTED
11			
12			
REMARKS: CONDITIONS ETC. <i>[Signature]</i>			
NO. PACKAGES	WEIGHT	RECEIVED BY <i>F.M.</i>	CHECKED BY
		DELIVERED TO	

Rediform®
 2H 260

BE SURE TO MAKE THIS
 RECORD ACCURATE AND COMPLETE

RECEIVING RECORD

4263

RECEIVED FROM Zenith	
ADDRESS Marcus Hook PA.	
PURCHASE ORDER NO. OR RETURNED 00000	FREIGHT BILL NO.
DATE 10/22/86	
VIA	PREPAID COLLECT

QUANTITY	DESCRIPTION
1 100	Drums
2	
3	Subject to wsp.
4	
5	
6	
7	
8	
9	
10	
11	
12	

REMARKS: CONDITIONS, ETC.

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO

REDIFORM
2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE



D.U.S. 242.5/28

200 COMM-FCE DRIVE ASTON, PA 19014-3293

INVOICE DATE 4/10/87

INVOICE NO. 070650 N/I

SOLD

**Natro Container
P.O. Box A
Trainer, PA. 19016**

TERMS

SHIP TO

30 DAYS NET

NO
ANTICIPATION
ALLOWED

D/I

DEPT.

CUST. NUMBER		REP.	P.O. NUMBER	CARRIER		
CTNS.	PIECES	DESCRIPTION		WEIGHT	PRICE	AMOUNT
	110	17H Open Head			3.00	\$330.00
	16	Closed Head			2.00	\$ 32.00
Your Truck P/U on 3/30/87 Ticket # 6110						



PRODUCTS CORPORATION

200 COMMERCE DRIVE ASTON, PA 19014-3293

INVOICE DATE

INVOICE NO. 079017 N/I

SOLD TO

Metro Container
P.O. Box A
Trainer, PA 19016

SHIP TO

TERMS

30 DAYS NET

NO
ANTICIPATION
ALLOWED

D/I

7/14/87

DEPT.

CUST. NUMBER		REP.	P.O. NUMBER	CARRIER		
90005						
CTNS.	PIECES	DESCRIPTION		WEIGHT	PRICE	AMOUNT
	99	17H Open Head Drums			3.00	297.00
	29	Bung Type Drums			2.00	58.00
		TOTAL				355.00
		Picked Up on 6/24/87 #6136				
CLAIMS FOR DAMAGED GOODS - IF THESE GOODS ARE RECEIVED SHORT OR IN DAMAGED CONDI- TION REQUEST FREIGHT OR EXPRESS AGENT TO MARK BILL TO THAT EFFECT OTHERWISE YOU HAVE NO CLAIM AGAINST TRANSPORTER WHO RECEIVED YOUR SHIPMENT FROM US IN GOOD ORDER ALL ADJUSTMENTS TO BE MADE WITHIN 7 DAYS AFTER RECEIPT OF GOODS				PLEASE PAY THIS AMOUNT		355.00

ki ORIGINAL

VED

Handwritten signature

16

AN

Total

17.00

18.00

5.00

address of



Metro-Enterprise Container Corp.

2031

Mailing Address:
POST OFFICE BOX A
CHESTER, PENNSYLVANIA
215-485-6100

SHIPPED
TO

ADDRESS

CITY

DATE 7/30/87

Zenith Metal Products200 Commerce DriveAston PA 19014

201061

PLEASE PAY FROM THIS INVOICE. NO MONTHLY STATEMENT WILL BE SENT.

TERMS - NET 30 DAY

ORDERED BY:

TAKEN BY:

DATE ORDERED		APPROX DATE PROMISED		CUSTOMER ORDER				REGISTRATION		DRIVER		TRAILER		
QUANTITY ORDERED (Approx)		QUANTITY SHIPPED	55 GAL.	30 GAL.	TYPE DRUM SPEC. #	TYPE HEAD	TYPE RING	LINED	BLASTED	GASKETS	BOLTS & NUTS	ASSEMBLED	UNIT PRICE	AMOUNT
312	67	X			SCRAP DRUMS BURNED AND CRUSHED								\$7.00	\$469.00
<div><div>VENDOR 1669</div><div>INVOICE 2031</div><div>G/L ADCT. 6300</div><div>REV. 023082</div><div>CROSS 469.00</div><div>DUE DATE 082787</div><div>PREPAID CHECK</div></div> <div>RECEIVER</div> <div>PRICE</div> <div>EXTENSION</div>														
PAY THIS AMT. ▶ \$469.00														
SALE		INVENTORY		COLOR OF BODY		COLOR OF HEAD		KEYPUNCHED FOR						
								SEP 03 1987						
								COMPUTER RUN						

RECEIVED BY:

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER DELIVERY RECEIPT SIGNED



PRODUCTS CORPORATION

200 COMMERCE DRIVE ASTON, PA 19014-3293

INVOICE DATE

INVOICE NO. 079273 N/I

9-14

Metro Container
P.O. Box A
Trainer, PA 19016

SHOOT TO

SHOOT TO

TERMS

30 DAYS NET

NO
ANTICIPATION
ALLOWED

☐ D/I

9/11/87 DEPT.

CUST. NUMBER 90005		REP.	P.O. NUMBER		CARRIER	
CTNS.	PIECES	DESCRIPTION		WEIGHT	PRICE	AMOUNT
	58	17H Drums			3.00	174.00
	26	Oil Type Drums			2.00	52.00
		TOTAL:				226.00

Pick Up on 9/27/87 - #4386

Charged to
to be delivered
from Vendor.
Jef.
12-11-87

CLAIMS FOR DAMAGED GOODS—IF THESE GOODS ARE RECEIVED SHORT OF OR IN DAMAGED CONDI-
TION REQUEST FREIGHT CARRIER'S AGENT TO MAINTAIN TO THAT EFFECT. OTHERWISE YOU HAVE
NO CLAIM AGAINST THE CARRIER WHO RECEIVED YOUR SHIPMENT FROM US. NO OTHER ALL
ADJUSTMENTS TO BE MADE WITHIN 3 DAYS AFTER RECEIVING OF GOODS.

PLEASE PAY

226.00

RECEIVING RECORD

6142

RECEIVED FROM <i>Zenith</i>		
ADDRESS <i>Aston PA.</i>		
PURCHASE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE <i>9/20/87</i>
VIA <i>T#225</i>		PREPAID <input checked="" type="checkbox"/> COLLECT <input type="checkbox"/>
QUANTITY	UNIT	DESCRIPTION
1 <i>17</i>		<i>17 H' OPEN ACADS</i>
2 <i>8</i>		<i>Bong type drums</i>
3 <i>67</i>		<i>Scrap drums</i>
4		
5		
6		
7		
8		
9		
10		<i>Tom Stupend</i>
11		
12		
REMARKS: CONDITIONS, ETC.		

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO
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REDIFORM
2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE



Metro-Enterprise Container Corp.

Mailing Address:
POST OFFICE BOX A
CHESTER, PENNSYLVANIA
215-485-6100

DATE ~~12/9/47~~

Zenith Products

~~200 Commerce Dr.~~

Aston PA 19014

SHIPPED

10

ADDRESS

CITY

PLEASE PAY FROM THIS INVOICE. NO MONTHLY STATEMENT WILL BE SENT.

TERMS - NET 30 DAYS

[illegible]

RECEIVED BY:

KEYPUNCHED FOR

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER DELIVERY RECEIPT SIGNED

APR 08 1988

COMPUTER RUN

VENDOR 1669
 INVOICE 3058
 ACCT. 6300
 DATE 030885
 %
 CHRG 175.00
 DUE DATE 040788
 PREPAID CHECK

RECEIVER _____
 PRICE _____
 EXTENSION 1669

ENDORSEMENT: 1669
PRICE: 2671
EXTENSION: 6300
TOTAL: 20987
DATE: 285.00
CHECK: 040788

METRO ENTERPRISE
TRAINER, PA

RECEIVED FROM Zenith Products
ADDRESS Ashton PA.

PURCHASE ORDER NO. OR RETURNED
GOODS

FREIGHT BILL NO.

DATE

3/8/88

VIA

T# 279

PAYMENT / COLLECT

QUANTITY	ITEM NUMBER	DESCRIPTION
1	61	17 H' OPEN HEADS
2	25	Bung type DRUMS
3	25	SCRAP DRUMS
4		
5		ALL DRUMS SUBJECT TO COUNT
6		AND INSPECTION BY METRO
7		
8		<i>Repl Borman</i>
9		
10		<i>J. Steinfeld</i>
11		
12		

REMARKS: CONDITIONS, ETC.

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO
--------------	--------	-------------	------------	--------------

REDIFORM
2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER DELIVERY. RECEIPT SIGNED BY CUSTOMER.
CREDIT DEF.



Zenith

PRODUCTS CORPORATION

200 Commerce Drive, Aston, Pennsylvania 19014 (215) 485-4700

8/30/87

ATTN : ACCOUNTS PAYABLE DEPT
METRO CONTAINER
P.O. BOX A
TRAINER PA 19016

GOOD MORNING!

Lyndy

GENTLEMEN

THE FOLLOWING OPEN INVOICES ARE CONSIDERABLY BEYOND OUR TERMS OF 1% 10
NET 30 :

DATE	INVOICE	STORE	AMOUNT
6/24/87	079017 **		355.00

CURRENT \$

TOTAL 355.00

9.2-87

WE ARE WRITING FOR THE SECOND TIME CONCERNING THOSE ITEMS WITH TWO
ASTERISK (**). PLEASE REMIT BY RETURN MAIL. FURTHER DELAY COULD
JEOPARDIZE YOUR CREDIT STANDING WITH OUR FIRM.

VERY TRULY YOURS
ZENITH PRODUCTS CORP

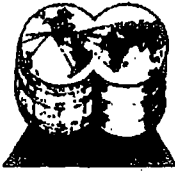
90005 A

KEYPUNCHED FOR
SEP 03 1987

COMPUTER RUN
DOLPH PEDICONE
CREDIT MANAGER

*Please
if time
as an eye
let me know
non
Pedicone*

DATE	8/30/87
INVOICE	079017
AMOUNT	355.00
TOTAL	355.00



Metro Container Corp

POST OFFICE BOX A SECOND & PRICE STREETS TRAINER, PENNSYLVANIA 19016
(215) 627-7288 TELEPHONES (215) 494-8200



December 17, 1987

ZENITH METALS
300 Commerce Drive
Aston, PA 19014

Gentlemen:

Regretfully we must advise that we have filed for Chapter XI protection under the bankruptcy laws. This action had to be taken without prior notice in order to protect the unsecured creditors, our employees and the continuity of our operation from an unexpected precipitous action taken by our secured lenders.

Our expectation is that we will continue operating both Metro and Metro-Enterprise and hope that you will be willing to continue your relationship with us. We hope to move through this unfortunate period as quickly as possible and emerge in sound condition.

Should you have any questions, please do not hesitate to call either Sidney Levy or myself.

Very truly yours,

Lewis Maslow
Lewis Maslow
C.E.O.

Sidney Levy
Sidney Levy
President



Commercial Loan Division

Personal Direct Dial

302 651 1575

December 1, 1987

Zenith Metal Products Corp.
200 Commerce Drive
Aston, PA 19014

Attn: Accounts Payable

RE: Metro Container Corporation
or Metro Enterprise Container Corporation

Dear Sir or Madam:

This is to advise you that Wilmington Trust Company holds a perfected, first security interest in all accounts receivable of the above entities to secure certain loans made by Wilmington Trust Company.

Please be advised that Wilmington Trust Company has exercised its rights upon default under the Uniform Commercial Code to collect the accounts receivable of Metro Container Corporation and Metro Enterprise Container Corporation directly. NOTICE IS HEREBY GIVEN that all payments by you to Metro Container Corporation and Metro Enterprise Container Corporation MUST BE sent directly to:

Wilmington Trust Company
Rodney Square North
Wilmington, DE 19890
Attn: Francis J. Ackerman

Your failure to comply with this notice may subject you to liability.

Very truly yours,

WILMINGTON TRUST COMPANY

Francis J. Ackerman
Vice President

FJA/lmh

(R/RS)

For the RECEIVED District of DELAWARE
ZENITH PRODUCTS

In re METRO CONTAINER CORP.,

DEC 11 1987

(E. ID. No. 23-2231601)

CREDIT DEPT

Case No. 87-520

Debtor

**ORDER FOR MEETING OF CREDITORS AND FIXING TIMES
FOR FILING COMPLAINTS TO DETERMINE DISCHARGEABILITY OF CERTAIN DEBTS,
COMBINED WITH NOTICE THEREOF AND OF AUTOMATIC STAY**

An order for relief under 11 U.S.C. chapter 11 having been entered on a petition filed by ~~METRO CONTAINER CORP.~~

METRO CONTAINER CORP.

of

P.O. Box A, 2nd and Price Streets
Trainer, Pennsylvania 19016

ON DECEMBER 7, 1987

it is ordered, and notice is hereby given, that:

1. A meeting of creditors pursuant to 11 U.S.C. §341(a) has been called by H. M. Leonard, U.S. Trustee, and scheduled for the 8th day of JANUARY, 1988 at 1:00 o'clock p.m. at U.S. COURT HOUSE, Rm. 1306 1st FLOOR, 844 KING STREET, WILMINGTON, DELAWARE.

2. The debtor shall appear in person (or, if the debtor is a partnership, by a general partner, or, if the debtor is a corporation by its president or other executive officer) at that time and place for the purpose of being examined.

3. A complaint objecting to the discharge of the debtor shall be filed not later than the first date set by the court for the hearing on confirmation of the plan of which you will receive notice.

4. *[If the debtor is an individual]* fixed as the last day for the filing of a complaint to determine the dischargeability of a debt pursuant to 11 U.S.C. §523(c).

You are further notified that:

The meeting may be continued or adjourned from time to time by notice at the meeting, without further written notice to creditors.

At the meeting the creditors may file their claims, *[if appropriate]* designate a person to supervise the meeting, examine the debtor, and transact such other business as may properly come before the meeting.

As a result of the filing of the petition, certain acts and proceedings against the debtor and his property are stayed as provided in 11 U.S.C. §362(a).

[If the debtor is an individual] If no complaint to determine the dischargeability of a debt under clause (2), (4) or (6) of 11 U.S.C. §523(a) is filed within the time fixed therefor as stated in subparagraph 4 above, the debt may be discharged.

The debtor (or trustee) has filed or will file a list of creditors and equity security holders pursuant to Rule 1007. Any creditor holding a listed claim which is not listed as disputed, contingent, or unliquidated as to amount, may, but need not, file a proof of claim in this case. Creditors whose claims are not listed or whose claims are listed as disputed, contingent, or unliquidated as to amount and who desire to participate in the case or share in any distribution must file their proofs of claim.

ANY CREDITOR NOTIFIED THAT HIS CLAIM IS DISPUTED, CONTINGENT OR UNLIQUIDATED MUST FILE A PROOF OF CLAIM ON OR BEFORE THE FIRST DATE SET FOR A DISCLOSURE STATEMENT HEARING.

Unless the court extends the time, any objection to the debtor's claim of exempt property (Schedule B-4) must be filed within 30 days after the conclusion of the meeting of creditors.

[If appropriate]

of

has been appointed trustee of the estate of the above-named debtor.

FOR THE COURT

Dated: December 9, 1987

Cavalier C. Ruciszewski
Clerk, Bankruptcy Court

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

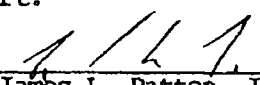
IN RE:)
) Case No. 87-521
METRO-ENTERPRISE CONTAINER)
CORPORATION,)
)
Debtor.)

NOTICE

PLEASE TAKE NOTICE that on January 22, 1988, this Court entered an Order approving a Stipulation and Order Regarding Use of Cash Collateral (the "Stipulation") allowing the captioned debtor to use cash collateral of Wilmington Trust Company and granting to Wilmington Trust Company, subject to the provisions of this notice, a post petition lien against assets of the captioned estate pursuant to 11 U.S.C. § 364(c)(3) (the "Lien") and a super-priority claim (the "Super-priority Claim") for all sums owed as additional protection pursuant to 11 U.S.C. § 364(c)(1). A copy of the Stipulation will be provided upon written request sent to James L. Patton, Jr., Young, Conaway, Stargatt & Taylor, 11th Floor, Rodney Square North, P.O. Box 391, Wilmington, Delaware 19899-0391.

PLEASE TAKE FURTHER NOTICE that a party having an objection to the granting of the Lien or the Super-priority Claim must request a hearing and file a written objection with the Court and serve it upon the undersigned counsel on or before May 25, 1987. If no objection is filed, the Order approving the Stipulation will become final as to all terms and conditions therein, including the granting of the Lien and Super priority Claim, without further order of this Court.

Dated: 3/29/88


James L. Patton, Jr.
YOUNG, CONAWAY, STARGATT & TAYLOR
11th Floor, Rodney Square North
P.O. Box 391
Wilmington, DE 19899-0391
(302) 571-6684
Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

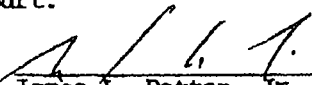
IN RE:)
) Case No. 87-520
METRO CONTAINER CORPORATION,)
)
Debtor.)

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Dated: 3/29/88


James L. Patton, Jr.
YOUNG, CONAWAY, STARGATT & TAYLOR
11th Floor, Rodney Square North
P.O. Box 391
Wilmington, DE 19899-0391
(302) 571-6684
Attorney for Debtor

VENDOR MASTER ADD - CHANGE

APØ1

41- ADD

42- CHANGE

ACTION

VENDOR

NUMBER

VENDOR NAME

1-2
[][]

3-7
[][][][][]

8-32
[] Z

ADDRESS LINE #1

33-57
[] Z

ALPHABETIC
CODE

58-60
[][][]

KEYPUNCHED FOR
DEC 08 1987
COMPUTER RUN

VENDOR MASTER CHANGE

ADØ 1

VENDOR NUMBER

ADDRESS LINE #2

1-2
4 3

3-7

	1	6	6	9
--	---	---	---	---

[illegible]

ADDRESS LINE #3

33-50 (city)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----

51-52 (STATE)

ZIP Code

STANDARD TERMS

53-57 E

65-79

M	E	T	I	C		S	C	V	D	F	L	A	B
---	---	---	---	---	--	---	---	---	---	---	---	---	---

METRO CONTAINER CORP.

P.O. BOX A
SECOND & PRICE STREETS
TRAINER, PA 19016

WILMINGTON TRUST COMPANY
WILMINGTON, DELAWARE

62-9 50
311

CHECK
20855

PAY Twenty Eight & No/100

TO THE
ORDER OF ZENITH METALS

DATE
4/14/87

AMOUNT
\$28.00

OPERATING ACCOUNT

ZENITH METALS
200 COMMERCE DRIVE
ASTON, PA 19014

James M. ...
W. J. ...
AUTHORIZED SIGNATURE

⑆03⑆⑆00092⑆ 236⑆ 5386⑆⑆

METRO CONTAINER CORP.

4/14/87

CHECK
20855

INV 2903

af. 7385

CHECK AMOUNT:

\$28.00

rec'd 4-17-87

METRO CONTAINER CORP.
P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

TO:

ZENITH METAL PRODUCTS
200 COMMERCE DRIVE
HIGHLAND IND PARK
ASTON, PA 19014.

INVOICE

Invoice No. 1838

SALESPERSON	DATE OF INVOICE 4/14/87
SHIP TO ZENITH METAL PRODUCTS 200 COMMERCE DRIVE HIGHLAND IND PARK ASTON, PA 19014	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	PR	F.O.B. PORT
22136Z	4/14/87	YOUR TRUCK			

QUANTITY

DESCRIPTION

17 320
55 GALLON HF DRUMS
BLACK AND WHITE

TERMS

N 10 DAYS

YOUR ORDER NUMBER

UNIT PRICE

AMOUNT

7.02

119

VENDOR	1669	RECEIVED
INVOICE	1838	PRICE
G/L ACCT.	2385	EXTENSION
INV. DATE	04/14/87	
DISC. %		
GROSS	119.00	
DUE DATE	050787	
PREPAID CHECK		

5-5-87
Mike

PROBLEM WITH

☐ PRICE

☐ QUANTITY

☒ purchase order?

VERIFY AND RETURN

BY

5-6-87

Joanne

OK
G/L
73-85

Thank You

TOTAL

(5119.

ORIGINAL

7 119.

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014



INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
4/14/87	1030	119.00		119.00
1069	TOTALS	119.00		119.00

**Zenith PRODUCTS CORPORATION**
200 Commerce Drive, Aston, Pennsylvania 19014

3-7588/2380

CHECK
NO.**02401****2401****PAY****5/14/87****Meritor Financial Group**
PHILADELPHIA, PA**AMOUNT**

TO THE ORDER OF

\$119.00**METRO CONTAINER CORP.**
SECOND & PRICE STS
BOX A
TRAINER**PA 19013****NON-NEGOTIABLE**

AUTHORIZED SIGNATURE

⑈02401⑈ ⑆236075663⑆ ⑆1 605911324⑈

Metro-Enterprise Container Corp.

2nd & PRICE ST. • TRAINER, PA 19013

(215) 485-6100

201061

CUSTOMER'S ORDER NO.

MEMO-6142

DATE _____

7-30-A7

NAME _____

ADDRESS

CITY & STATE

ZIR

SHIPPED VIA

QUAN	DESCRIPTION	PRICE	AMOUNT
67	Scrap steel	700	
	3/2		
	Burned & crushed		

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

11312

2031

REC'D BY

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014



INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
10/27/87	2031	114.00		114.00
10/27	TOTALS	114.00		114.00

Zenith PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

3-7566/2360

CHECK
NO. 000007

10/27/87

PSFS

Meritor Financial Group
PHILADELPHIA, PA

114.00
AMOUNT

PAY
TO THE ORDER OF

METRO CONTAINER CORP.
SECURITY & PRICE STS
CNA A
TRAINER

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE



(215) 485-6100

SHIPPED VIA AIR MAIL

[illegible]

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

11317

2671

REC'D BY

PURCHASE MEMO

Metro-Enterprise Container Corp.

Name _____

Address

CPV

Ship Via

[illegible]

1420

REC'D BY

METRO CONTAINER CORP.

P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

TO:

Zenith Products
200 Commerce Drive
Aston PA

INVOICE

SALESPERSON

DATE OF INVOICE

12/4/87

SHIP TO

CREDIT

12/4/87

QUANTITY

104
19

320 55 Gallon 17H OH Drums

\$3.00
2.00

\$312.00
38
\$350

CREDIT

TOTAL

\$312.00

ORIGINAL

Thank You

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014



INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
12/04/87	2667	344.00		344.00
12/04/87	2671	285.00		285.00
4/14/87	19273	226.00-		226.00-
12/04/87	120467	350.00-		350.00-
1669	TOTALS	1000.00		1000.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

3-7588/2360

CHECK
NO. 012428PAY
TO THE ORDER OF

12/22/87

 **PSFS.**Moritor Financial Group
PHILADELPHIA, PA

12428

AMOUNT

\$1000.00

WILMINGTON TRUST CO.
RODNEY SQUARE NORTH
WILMINGTON DE 19890
ATTN: FJ ACKERMAN 19013**NON-NEGOTIABLE**

AUTHORIZED SIGNATURE

0012428 000000000000 000000000000

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
7/09/85	10904	140.00		140.00
1501	TOTALS	140.00		140.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

62-4
311

CHECK
NO.

27375

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

27375

PAY

TO THE ORDER OF

AMOUNT

\$140.00

METRO CONTAINER CORP.
SECOND & PRILE STS
BOX A
TRAINER

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

Metro-Enterprise Container Corp.

2nd & PRICE ST. • TRAINER, PA 19013

(215) 485-6100

CUSTOMER'S ORDER NO. 6283 DATE 3-5-88

NAME _____

ADDRESS 200 Commerce Way Highland Park Va

CITY & STATE

ZIP 9014

SHIPPED VIA.

QUAN	DESCRIPTION	PRICE	AMOUNT
25	396 Scrap Iron Burned & Crushed	7 ⁰⁰	175.00
		M/R	

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

44317

3058

REC'D BY

2nd & PRICE ST. • TRAINER, PA. 19013
(215) 627-7288 (215) 494-8200

SHIPPED VIA 5/22/83

QUAN	DESCRIPTION	PRICE	AMOUNT
8	59¢/lb #15 Green Peanut all Green Oil property Sole		

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

8195

REC'D BY

METRO CONTAINER CORP.
P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

TO:

Zenith Metal Products
200 Commerce Drive
Highland Ind. Park
Aston, Pa. 19014

INVOICE

NO. 8195

SALESPERSON	DATE OF INVOICE
	11/21/85
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	P.P.	F.O.B. POINT	TERMS	YOUR ORDER NUMBER	UNIT PRICE	AMOUNT															
200160						Net	0438-266																	
QUANTITY	CODE	DESCRIPTION																						
8	10	.55 Gallon HF Drums						\$15.00	\$120.00															
		PAINTED GREEN																						
<div data-bbox="896 1390 1534 1705" data-label="Form"> <table border="1"> <tr> <td>VENDOR</td> <td>RECEIVER</td> </tr> <tr> <td>INVOICE</td> <td>PRICE</td> </tr> <tr> <td>G/L ACCT.</td> <td>EXTENSION</td> </tr> <tr> <td>INV. DATE</td> <td></td> </tr> <tr> <td>DISC. %</td> <td></td> </tr> <tr> <td>GROSS</td> <td></td> </tr> <tr> <td>DUE DATE</td> <td></td> </tr> <tr> <td>PREPAID CHECK</td> <td></td> </tr> </table> </div>							VENDOR	RECEIVER	INVOICE	PRICE	G/L ACCT.	EXTENSION	INV. DATE		DISC. %		GROSS		DUE DATE		PREPAID CHECK			
VENDOR	RECEIVER																							
INVOICE	PRICE																							
G/L ACCT.	EXTENSION																							
INV. DATE																								
DISC. %																								
GROSS																								
DUE DATE																								
PREPAID CHECK																								
<div data-bbox="695 1738 928 1810" data-label="Text"> <p><i>Thank You</i></p> </div>							TOTAL	\$120.00																

ORIGINAL

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
11/21/85	8199	120.00		120.00
1559	TOTALS	120.00		120.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

62-4
311

CHECK
NO.

20360

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

12/11/85

20360

AMOUNT

PAY
TO THE ORDER OF

120.00

METRO CONTAINER CORP.
SECOND & PRICE STS
BOX 3
CHAMBERN

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

2nd & PRICE ST. • TRAINER, PA. 19013
(215) 627-7288 (215) 494-8200

SHIPPED VIA _____

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

REC'D BY

ALL TRAVELERS MUST BE ACCOMPANIED BY THE

METRO CONTAINER CORP.
P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

TO:

Zenith Metal
200 Commerce Dr.
Aston, Pa. 19014

NO. 8469

SALESPERSON	DATE OF INVOICE
	1/15/86
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL.	P.P.	F.O.B. POINT
200160		Picked Up			
QUANTITY	CODE	DESCRIPTION			
75		Rubber Gaskets			

TERMS	YOUR ORDER NUMBER
Net	1326
UNIT PRICE	AMOUNT
.40	\$30.00

VENDOR	RECEIVER
INVOICE	PRICE
C/L ACCT.	EXTENSION
INV. DATE	
DISC. %	
GROSS	
DUE DATE	
PREPAID CHECK	

ORIGINAL

Thank You

TOTAL \$30.00

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
1/15/66	8453	30.00		30.00
	TOTALS	30.00		30.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

624
311

CHECK
NO.

21219

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

21219

PAY
TO THE ORDER OF

1/31/66

AMOUNT

30.00

ATTEND CONTAINER CO. 47.
ALSO 6 PRICE 375
BOX 4
PRINTER

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

(215) 627-7288 (215) 494-8200

REC'D BY _____

METRO CONTAINER CORP.

P.O. Box A
Second & Price Streets.
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

TO:

Zenith Metal Products
200 Commerce Drive
Highland Ind. Park
Aston, Pa. 19014

INVOICE

NO. 8826

SALESPERSON	DATE OF INVOICE
	3/20/86
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	P.P.	F.O.B. POINT	TERMS	YOUR ORDER NUMBER											
> QUANTITY	CODE	DESCRIPTION				Net	UNIT PRICE	AMOUNT										
20	320	55 Gallon HF Drums R & R PAINTED BLACK & WHITE					\$7.00	\$140.00										
<div data-bbox="365 1470 982 1768"><table><tr><td>VENDOR</td><td>RECEIVER</td></tr><tr><td>INVOICE</td><td>PRICE</td></tr><tr><td>DATE</td><td>EXTENSION</td></tr><tr><td colspan="2">DUE DATE</td></tr><tr><td colspan="2">PREPAID CHECK</td></tr></table></div>							VENDOR	RECEIVER	INVOICE	PRICE	DATE	EXTENSION	DUE DATE		PREPAID CHECK		KEY POUNDED FOR COMPLETE	
							VENDOR	RECEIVER										
INVOICE	PRICE																	
DATE	EXTENSION																	
DUE DATE																		
PREPAID CHECK																		
TOTAL							\$140.00											

ORIGINAL *Thank You*

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
3/20/86	8826	140.00		140.00
1669	TOTALS	140.00		140.00



62-4
311

CHECK
NO.

22590

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

22590

4/08/86

PAY

AMOUNT

TO THE ORDER OF

3140.00

METRO CONTAINER CORP.
SECOND & PRICE STS
BOX A
TRAINER

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

(215) 627-7288 (215) 494-8200

DATE _____

9-9-86

Zenith Metal Products

2nd Commerce Court.

Highland Inn Park

Boston Pa

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL.

REC'D B

COODS MUST BE ACCOMPANIED BY THIS BILL
Chil Terpetra 9-7-86

METRO CONTAINER CORP.
P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

10804

TO:

Zenith Metal Products
200-Commerce Drive
Highland Industrial Park
Aston PA

SALESPERSON	DATE OF INVOICE
	9/9/86
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	PP	F.O.B. POINT	TERMS	YOUR ORDER NUMBER	
201060	9/9/86	Your Truck				Net		
QUANTITY	DESCRIPTION						UNIT PRICE	AMOUNT
20	320	55 Gallon HF Drums					\$7.00	\$140.00
	Painted: Black & White							
	Exchange for 20 Raw Drums							
ORIGINAL							TOTAL	\$140.00

Thank You

Thank You

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
7/07/85	10904	140.00		140.00
1985	TOTALS	140.00		140.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

62-4
311

CHECK
NO.

27375

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

27375

PAY
TO THE ORDER OF

AMOUNT
\$140.00

METRO CONTAINER CORP.
SECOND & PRILE STS
BOX A
TRAINER

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE



January 31, 1990

Mr. Peter Kho
Removal Enforcement Section
U.S. E.P.A.
841 Chestnut Street
Philadelphia, PA 19107

Dear Mr. Kho:

Per our phone conversation of 1/29/90, Zenith authorizes release of information to those individuals that specifically request information pertaining to the Metro Container site clean-up.

If more information is needed please contact me directly.

Thank you,

A handwritten signature in dark ink, appearing to read 'Briggs Pletcher', is written over a horizontal line.

Briggs Pletcher
Engineering Manager

sm

200 Commerce Drive
Aston, PA 19014-3293

(215) 485-4700
SALES (215) 485-2685
FAX (215) 485-0187
TELEX #820845

1/22

Carl Everett

Saul, Ewing - Riemick & Saul

(215) 972-7171

PRP Council
Rep.

PRP is only people to get info.



April 20, 1988

Mr. Lawrence Falkin
U.S. E.P.A., Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia PA 19107

Dear Mr. Falkin:

In response to EPA letter dated April 12, 1988 we submit to you the material enclosed.

- 1) Zenith Products has had no hazardous substances transported to, or disposed of at, Metro Container Corp.
- 2) Zenith Products has had approximately 600 empty 55 gallon drums transported from Zenith Products to Metro Container Corp by Metro Container over the last 2 1/2 years. Drums were basically sold to Metro for reconditioning.
- 3) Shipments to Metro Container and receipts from Metro are documented in the attached information.
- 4) No correspondence occurred between Zenith Products and any regulatory agency regarding the drums sold to or removed by Metro Container Corp.
- 5) There exists no written correspondence between Zenith Products and Metro Container Corp. other than those documents attached.
- 6) There has been no third party involvement in the relationship between Zenith products and Metro Container Corp.
- 7) Zenith Products has no real interests in the properties occupied by Metro Container Corp.
- 8) Drums were sent to Metro Container largely for reconditioning, except as where noted; some drums were sent to Metro Container for crushing and burning.

Mr. Lawrence Falkin
April 20, 1988

Page 2

Zenith Products is not privately insured against releases of hazardous wastes or substances as a result of handling of such material.

I have made all efforts possible to accumulate documents pertaining to Metro Container Corp. If further information is requested please contact me directly.

All drums removed by Metro Container were inspected by Zenith personnel and Metro Container Personnel to verify there was no residual substances contained within them. Prior to removal drums contained raw materials such as: Paint, Oil, Electroplating, Chemicals and Solvents.

Zenith Products wishes to assist in the gathering of any information requested. We also would like to retain operational anonymity in public view, where possible.

Sincerely,



Briggs Fletcher
Assistant Engineering Manager

/jrl



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

OVERNIGHT MAIL

A. James Aruffo
Zenith Corporation
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014

NOV 15 1993

Re: Metro Container Site

Dear Mr. Aruffo:

By letter dated July 16, 1993, EPA requested clarification regarding possible business confidentiality claims asserted by Zenith Corporation regarding documents submitted in connection with the Metro Container Superfund Site in Trainer, Pennsylvania. EPA's letter requested that the company notify the Agency of claims that may have been asserted and to substantiate such claims in accordance with regulations found at 40 C.F.R. Part 2, Subpart B. Such claims were to have been substantiated within thirty (30) business days of the company's receipt of the letter. The letter made clear that claims which were not adequately substantiated within this timeframe would be deemed waived.

This is to notify you that EPA has not received substantiation of confidentiality claims that might have been asserted by the company regarding documents submitted in connection with the Metro Container Superfund Site. EPA considers any business confidentiality claims regarding such documents to be waived. Accordingly, EPA may release these documents to the public without prior notice to the company.

Please contact me at (215) 597-1126 if you have any questions concerning this matter.

Sincerely,

Catherine McCool

Catherine McCool
Senior Paralegal Specialist



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

APR 12 1988

In Reply Refer to: 3HW14

Zenith Products
A. James Aruffo
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014

Re: Metro Container Corporation Site

Dear A. James Aruffo:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), you are requested to furnish all information and documents in Zenith Products's possession, custody, or control, or in the possession, custody, or control of any of Zenith Products's officers, employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), including but not limited to empty unwashed 55 gallon drums or other containers which Zenith Products generated, transported, disposed of, or arranged for transportation or disposal of at the Metro Container Corporation or Metro Enterprises Container Corporation or Universal Container Corporation at Second and Price Streets, Trainer, PA 19013 (the "Site").

All information and documents requested are due to the address listed below within ten (10) calendar days of receipt of this letter.

The response should include, but not be limited to, information and documentation concerning:

1. The types and quantities of the hazardous substances generated or transported by Zenith Products and sent to, transported to, or disposed of at the Site;
2. the quantities and residual contents of unwashed 55 gallon drums or containers which Zenith Products generated or transported and which were sent to, transported to, or disposed of at the Site, whether or not they contained hazardous substances;
3. the date(s) such substances and/or containers were sent to, transported to, or disposed of at the Site;
4. any correspondence between Zenith Products and any regulatory agencies regarding such substances and/or containers;
5. any correspondence between Zenith Products and Metro Container Corporation, Metro Enterprise Container Corporation, or Universal Container Corporation or any other third party regarding such substances and/or containers;
6. the identity of, and documents relating to, any other persons who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances and/or containers to the Site;
7. copies of any deeds, rights-of-way, leases, or other real interests which Zenith Products has or had in the Site; and
8. whether the substances or containers described above were sent to or transported to the Site for disposal, or reconditioning and return, or reconditioning and resale by Metro Container Corporation or Metro Enterprise Container Corporation or Universal Container Corporation.

Please describe any documents that were maintained by Zenith Products of the transactions with Metro Container Corporation or Metro Enterprise Container Corporation or Universal Container Corporation, including the date of the documents, the author of the documents, the current location of the documents and the current custodian, and all efforts that were taken to identify these documents.

In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all relevant insurance policies.

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality covering all or part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

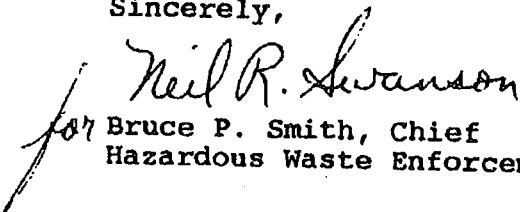
Please send the required information to:

Lawrence Falkin
U.S. Environmental Protection Agency, Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this matter, please contact Lawrence Falkin at (215) 597-6679.

Sincerely,

Neil R. Swanson

for Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch



April 20, 1988

Mr. Lawrence Falkin
U.S. E.P.A., Region III
CERCLA Removal Enforcement Section (3HW13)
841 Chestnut Building, 6th Floor
Philadelphia PA 19107

Dear Mr. Falkin:

In response to EPA letter dated April 12, 1988 we submit to you the material enclosed.

- 1) Zenith Products has had no hazardous substances transported to, or disposed of at, Metro Container Corp.
- 2) Zenith Products has had approximately 600 empty 55 gallon drums transported from Zenith Products to Metro Container Corp by Metro Container over the last 2 1/2 years. Drums were basically sold to Metro for reconditioning.
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- 6) There has been no third party involvement in the relationship between Zenith products and Metro Container Corp.
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Mr. Lawrence Falkin
April 20, 1988

Page 2

Zenith Products is not privately insured against releases of hazardous wastes or substances as a result of handling of such material.

I have made all efforts possible to accumulate documents pertaining to Metro Container Corp. If further information is requested please contact me directly.

All drums removed by Metro Container were inspected by Zenith personnel and Metro Container Personnel to verify there was no residual substances contained within them. Prior to removal drums contained raw materials such as: Paint, Oil, Electroplating, Chemicals and Solvents.

Zenith Products wishes to assist in the gathering of any information requested. We also would like to retain operational anonymity in public view, where possible.

Sincerely,



Briggs Fletcher
Assistant Engineering Manager

/jrl



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

JUN 17 1988

Zenith Products Corp.
Briggs Pletcher, Asst. Manager
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014

Distribution List Enclosed

Dear Mr. Pletcher:

This letter is to inform you that the initiation of Site activities by EPA at the Metro Container Site has been postponed. A new target date for initiating these activities has not been established.

EPA encourages the private parties involved with this Site to take advantage of this unforeseen delay by preparing a proposal for privately conducted response activities.

Enclosed for your information is a description of the removal activities which EPA considers necessary at the Site and an estimate of the cost of this work if it were performed by EPA.

Please contact me at (215) 597-6679 if you want further information or want to discuss a clean-up agreement.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. Falkin".

Lawrence Falkin, Compliance Officer
CERCLA Removal Enforcement Section

Enclosure

Angelo Foglia, Jr.
AFCO Drum Handlers
81 Commercial Avenue
Avenel, NJ 07001

AMF Co.
81 Oak Forrest Drive
Sicklerville, NJ 08081

ARCO Chemical Company
H. A. Sorgenti, President
3801 West Chester Pike
Newtown Square, PA 19073

Amtrak
National Railroad Passenger Corp.
R.T. Noonan
400 North Capitol St., N.W.
Washington, DC 20001

Atlantic Refining & Marketing Corp.
Thomas S. Stammel, Esq.
1016 West Ninth Avenue
King of Prussia, PA
P.O. Box 1050
Southeastern, PA 19398-1050

Autoline Lubricants
Bob Scott, Vice President
900 South Caroline Street
Baltimore, MD 21231

BP America, Inc. - Law Department
Jack L. Litmer
200 Public Square, 39-5300-B
Cleveland, Ohio 44114-2375

C.B. Hooper and Sons
Charles B. Hooper, Jr.
President
P.O. Box 396
Main Street
Intercourse, PA 17534

Callahan Chemical Company
James Callahan, Jr.
Manager
Broad & Filmore Avenue
Palmyra, NJ 08065

Paul W. Callahan, Esq.
Fox, Differ, Callahan, Ulrich & O'Hara
317 Swede Street
Norristown, PA 19401

Capitol Lubricants
Cal Stevens, President
569 Industrial Drive
Lewisbury, PA 17339

John L. Wittenborn
Collier, Shannon, Rill & Scott
1055 Thomas Jefferson St., N.W.
Washington, DC 20007

Chevron Corporation
Daniel E. Vineyard, Esq.
555 Market Street
San Francisco, CA 94120-7141

Conestoga Foundry
Henry Witmeyer, President
Hill Drive & West State Street
Hamburg, PA 19526

Conestoga Fuel
General Manager
1145 Elizabeth Avenue
P.O. Box 4665
Lancaster, PA 17604

Donald B. Kelly
2008 Federal Street
Camden, NJ 08105

E. I. DuPont de Nemours & Company, Inc.
Pamela Meitner, Esq., Legal Department
1007 Market Street
Wilmington, Delaware 19898

EC Barnes Incorporated
Roy Fahnestock, Manager
8632 Lincoln Way, West
St. Thomas, PA 17252

EJ Koenig
Edward Koenig, President
230 Rte. 130 South
Bordentown, NJ 08505

Henry B. Kessler, Esq.
Kessler, Tutek & Gladfelter
325 Farnsworth Avenue
P.O. Box 111
Bordentown, NJ 08505-0111

First State Steel Drum Company
John Ryan, Owner
4030 New Castle Avenue
New Castle, DE 19720

Thomas S. Lodge, Esq.
Connally, Bove, Lodge, & Hutz
1220 Market Building
P.O. Box 2207
Wilmington, DE 19899

Flippo Oil
Harry F. Flippo, President
3030 South Main Street
Harrisonburg, DE 22801-2694

Fritch Fuel Company
Lowell Brogan, Vice President
P.O. Box 1037
116 River Street
Bethlehem, PA 18016

Gilbert Spruance Co.
Richard T. Greene
Richmond & Tioga Streets
Philadelphia, PA 19134

Herb Toy, Incorporated
Box 245
Franklinville, NJ 08322

Industrial Solvents and Chemical Co.
Andrew P. Rawicz, President
210 Stevens Road, York Haven
P.O. Box 158
Emigsville, PA 17318

JT Waring and Sons
Vincent Warring, President
4545 South Street
Capitol Heights, MD 20743

JTM Drum
P.O. Box 169
Sayerville, NJ 08872

Jay Gress, Incorporated
Jay Gress, President
1225 W. Ridge Pike
Conshohocken, PA 19428

Kessler Chemical, Inc.
Barry Kessler, President
270 Street Road
New Hope, PA 18938

Lehigh Gas and Oil Company
Roman Baran, Manager
80 Broad Street
Beaver Meadows, PA 18216

Lightman Drum Company, Inc.
Jerome Lightman, President
Rt. 73, at 12 Mile Marker
Cedarbrook, NJ 08018

Lyondell Petrochemical Corp.
C. T. Corp. Systems
123 South Broad Street
Philadelphia, PA 19134

Mauger and Company, Incorporated
1015 Baltimore Pike
Media, PA 19063

Mobile Oil Corporation
Shari Gulbrandsen, Esq.
3225 Gallows Road
Fairfax, VA 22037-0001

National Solvents
Rodger Kunis, Vice President
8735 Old Route 13
Tullytown, PA 19007

Norton Petroleum
Barry Norton, President
290 Possum Park Road
Newark, DE 19171

Petroleum Products
Tony Minite, General Manager
P. O. Box 2621
900 Eisenhower Boulevard
Harrisburg, PA 17105

Petrolite Corporation
Ron Stephenson, Manager
4th and Saville Avenue
Eddystone, PA 19013

Pioneer Oil Company, Inc.
Morton Segal, Vice President
61st and Passyunk Avenue
P. O. Box 16935
Philadelphia, PA 19153

Quality Container Corporation
Morton Lightman, Consultant
P. O. Box 2688
Trenton & Ontario Streets
Philadelphia, PA 19134

Kevin F. Wall, Esq.
407 White Horse Pike
Oaklyn, NJ 08107-1451

Reit Lubricants
Richard Keyser, Vice President
899 Mearns Road
Warminster, PA 18974

Jeffrey A. Smith, Esq.
Clark, Ladner, Fortenbaugh & Young
1818 Market Street, 32nd Floor
Philadelphia, PA 19103

Reliable Recyclers
Stanley Miller, President
Reliable Industries, Inc.
178 Greenfield Road
Lancaster, PA 17601

Rhodes Drums
Dusty Rhodes, Owner
2000 Federal Street
P. O. Box 2571
Camden, NJ 08101

Bob O'Donnell Steel Drums
Bob O'Donnell, Owner
607 Wynne Road
Springfield, PA 19064

Rohm & Haas
C.T. Corporate Systems
123 South Broad Street
Philadelphia, PA 19134

Scot Lubricants of PA, Inc.
Glenn D. Krasley
1715 East Tremont St.
Box 505
Allentown, PA 18105

Sentry Paint Technologies, Inc.
Ellis Breskman, President
237 Mill Street
P. O. Box 272
Darby, PA 19023

Sukonik Barrel and Drum Company
Louis Sukonik, Agent
1000 Arboretum Road
Wyncote, PA 19095

Sun Oil Company (SUNOCO)
Mr. Mazzei, General Manager
Green & Delaware Avenue
P. O. Box 395
Marcus Hook, PA 19064

Sun Transport (Division of SUNOCO)
James Nolan, President
P. O. Box 2225
500 West Dutton Mill Road
Aston, PA 19014

Thomas A. Crawford
Marine Operations
500 West Dutton Mill Road
P. O. Box 2224
Aston, PA 19014-2224

Superior Drum
218 Crafton Avenue
Pitman, NJ 08071

Tastykake, Inc.
Nelson G. Harris, President
2801 Hunting Park Avenue
Philadelphia, PA 19129

Tunnel Barrel and Drum
85 Triangle Boulevard
Carlstadt, NJ 07072

Philip M. Saginario, Esq.
126 Market Street
Paterson, NJ 07505

USX Corporation (U.S. Steel Corporation)
Leo M. Pruett, Esq.
600 Grant Street
Pittsburgh, PA 15230

WN Stevenson
Tom Holsue, Vice President
246 Rockhill Road
Bala Cynwyd, PA 19004

Nancy M. Ware, Esq.
Schnader, Harrison, Segal & Louis
1600 Market Street, Suite 3600
Philadelphia, PA 19103

Westinghouse Electric Corporation
John A. Ristuccia
Dutton Mill Center
600 West Dutton Mill Road
Aston, PA 19014

Wiley's Auto Express, Inc.
Fred Wiley, Jr. President
Oak Lane & McDade Blvd.
Glenolden, PA 19036

William H. Cooper and Sons
Ed Cooper, President
320 Brown Street
Philadelphia, PA 19133

William Jones and Sons, Inc.
238 Liberty Street
Camden, NJ 08401

William C. Grabarek, Esq.
Witco Corporation
2701 Lake Street
Melrose Park, IL 60160

Zenith Products Corp.
Briggs Pletcher, Asst. Manager
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014

O. F. Zurn Company
John Ballinger, President
2736 North Broad Street
Philadelphia, PA 19132

Metro Container Corp.
Sidney Levy
2nd & Price Streets
Trainer, PA 19013

Metro-Enterprises Container Corp.
Sidney Levy
2nd & Price Streets
Trainer, PA 19013

IV. PROPOSED OPTIONS AND COSTS

Option 1 - Comprehensive Removal Response

The actions proposed to abate further offsite migration, direct contact threat to the public, and ground water contamination include the use of an onsite incineration or a solvent extraction method to treat the sludge waste in the drums, lagoon, tank, earthen containment areas, and the sludge-contaminated soils. In addition, a chain link fence will be erected. After these areas are addressed, the discharge points of unknown origin will be traced to their onsite origin and addressed.

Treatment of the wastes onsite has been selected in order to comply with the November 1988 Land Disposal Restrictions. The primary objective of the proposed action is the mitigation of the environmental threats of offsite migration and ground water contamination.

The Metro Container Site is not on the NPL, and has not received an HRS rating. This will be the first removal action at the site. The proposed actions will contribute to the efficient performance of long-term remedial actions in that it will prevent further offsite migration and ground water contamination.

This proposed action is appropriate for addressing this situation in order to comply with the November 1988 Land Disposal Restrictions. The sludge and the ash cannot be transported to a landfill in their current state. By incineration, the organics will be destroyed and the volume of waste will be reduced. Post-treatment of the ash may be necessary, as the metals present may exceed E.P Toxic levels. Since the facility is located in an industrial area and it currently employs a thermal waste treatment process, the public should not be opposed to a mobile incinerator operation. Solvent extraction may also be feasible. Because the sludge contains both organic and metal contaminants, a two-step process may be required.

Temporary solutions to abate offsite migration and to prevent further ground water contamination include the collection of waste onsite and its placement into protective containment. Because of the present volume of waste (approximately 85,000 gallons of sludge and 1500 cubic yards of soil), the containment structure(s) would be quite large. The amount of contaminated

DRAFT

(9)

soil has not been estimated (this will require further sampling after drum removal). In addition, the amount of contamination from the discharge points of unknown onsite origin will not be able to be estimated until after all surface drums and soil contamination have been addressed. Therefore, the total volume of waste that would be stored onsite cannot be accurately estimated before the project begins.

Option 2 Site Stabilization: Erect fencing around the site property boundaries, berm the areas of offsite migration, and locate and retard areas onsite that are contributing to the unknown discharge points into Stoney Creek. These temporary measures could be completed in approximately sixty days from mobilization. However, these measures would not contribute to ground water contamination abatement.

Option 3 OffSite Incineration and Disposal: Transport all wastes to a permitted incineration facility for treatment and disposal. This option bears high costs associated with transportation, treatment, and disposal. If a treatment and disposal facility is not available when wastes are ready for transport, the wastes may remain at a temporary storage facility until wastes are accepted for treatment.

Option 4 Solidification: Solidify all liquid, sludge and contaminated soils. This method will result in an increased volume of waste, and may not rectify the leachability problem. This method of treatment is expected to take approximately four months to complete.

The OSC believes that option 1 is preferred because it would address all threats at the site and not likely require any future actions to mitigate the on-going off site migration of contaminants at this site. However due to the limited removal funds currently available in the Region, the OSC recommends that option 2 be implemented as first phase action.

Estimated Costs

Estimated costs have been calculated using site stabilization as the proposed action.

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Summary of Costs	Estimated Costs
(Extramural Costs)	
Cleanup Contractors	\$ 120,000.00
Cleanup Contingency	12,000.00
(13% of Cleanup Contractor Costs)	
TAT Costs	20,000.00
Subtotal Extramural	152,000.00
Project Contingency (15%)	22,800.00
TOTAL EXTRAMURAL	\$ 174,800.00
(Intramural Costs)	
EPA Direct	
Regional (1500 hours x 30)	12,000.00
Headquarters (150 hours x 30)	1,200.00
EPA Indirect (1500 hours x 30)	20,800.00
TOTAL INTRAMURAL	\$ 34,000.00
TOTAL PROJECT CEILING	\$ 208,800.00

Estimated costs have been calculated using onsite incineration as the treatment technology. A two-step solvent extraction method will approach these costs.

Summary of Costs	Estimated Costs
(Extramural Costs)	
Cleanup Contractors	\$1,300,000.00
Cleanup Contingency	130,000.00
(10% of Cleanup Contractor Costs)	
TAT Costs	80,000.00
ERT/REAC	30,000.00
Subtotal Extramural	1,530,000.00
Project Contingency (15%)	226,500.00
TOTAL EXTRAMURAL	\$1,736,500.00
(Intramural Costs)	
EPA Direct	
Regional (1500 hours x 30)	45,000.00
Headquarters (150 hours x 30)	4,500.00
EPA Indirect (1500 hours x 52)	78,000.00
TOTAL INTRAMURAL	\$ 127,500.00
TOTAL PROJECT CEILING	\$1,864,000.00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Via Overnight Mail

Distribution List Enclosed

Dear Sir/Madam:

EPA has determined that an imminent and substantial endangerment to the environment as defined by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), 42 U.S.C. §§ 9601 et seq., exists at the Metro Container Site (Site). An immediate response is necessary to abate this endangerment. EPA plans to initiate Site activities on June 1, 1988. By this letter, EPA is offering your company the opportunity to undertake the activities which are outlined in the scope of work enclosed. Please note that the scope of work describes only an initial phase of work and activities beyond this scope of work may be required at a future date.

Your company, alone or in collection with other entities, must provide EPA with a written offer by May 27, 1988, if you wish to perform the activities described in the scope of work instead of EPA. The offer must contain an unconditional statement of willingness to perform all elements of the scope of work, provide for initiation of Site activities by June 1, 1988, provide for completion of Site activities within 60 days after initiation, and include evidence of your financial and technical ability to perform the required measures.

Please direct your response to:

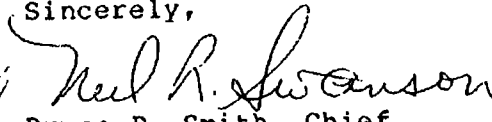
Lawrence Falkin
United States Environmental Protection Agency
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building
Philadelphia, PA 19107

Phase 1 - June 1 (stabilization work) as listed
Bigger job later

60,000 empty Drums on site
500-1000 Drums of sludge

If you need further information, or if you have any questions with regard to this matter, please contact Mr. Falkin at (215) 597-6679.

Sincerely,

for 
Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch

Enclosure

Scope of Work - CERCLA Removal
Metro Container Site
Trainer, Delaware County, Pennsylvania

1. Fencing - The Site must be surrounded by a fence sufficient to control site access. This fence must, at a minimum, be 6 feet chain link topped by 2 strands of barbed wire. Vehicle and personnel gates must be provided as necessary to permit authorized access to the Site.
2. Warning Signs - Warning Signs must be posted at all entrances and at other locations in sufficient numbers to be seen from any approach to the Site.
3. Berm - A berm must be erected which will prevent surface water from the Site from entering Stoney Creek.
4. Leachate Source Identification - Activities must be undertaken to identify the source of contaminants which are entering Stoney Creek through groundwater and leachate seeps.
5. Leachate Source Control - Activities must be undertaken to minimize migration of contaminants which are entering Stoney Creek through groundwater and leachate seeps.

AFCO
81 Commercial Avenue
Avenel, NJ 07001

AMF Co.
81 Oak Forrest Drive
Sicklerville, NJ 08081

ARCO Chemical Company
H.A. Sorgenti, President
3801 West Chester Pike
Newtown Square, PA 19073

Amtrak
National Railroad Passenger Corp.
R.T. Noonan
400 North Capitol St., N.W.
Washington, DC 20001

Atlantic Refining & Marketing Corp.
Thomas S. Stammel, Esq.
1016 West Ninth Avenue
King of Prussia, PA
P.O. Box 1050
Southeastern, PA 19398-1050

Autoline Lubricants
Bob Scott, Vice President
900 South Caroline Street
Baltimore, MD 21231

BP America, Inc. - Law Department
Jack L. Litmer (216) 586-6598
200 Public Square, 39-5300-B
Cleveland, Ohio 44114-2375

C.B. Hooper and Sons
Charles B. Hooper, Jr.
President
Main Street
Intercourse, PA 17534

Callahan Chemical Company
James Callahan, Jr.
Manager
Broad & Filmore Avenue
Palmyra, NJ 08065

Paul W. Callahn, Esq.
Fox, Differ, Callahan, Ulrich & O'Hara
317 Swede Street
Norristown, PA 19401

Capitol Lubricants
Cal Stevens, President
569 Industrial Drive
Lewisbury, PA 17339

John L. Wittenborn
Collier, Shannon, Rill & Scott
1055 Thomas Jefferson St., N.W.
Washington, DC 20007

Chevron Corporation
Daniel E. Vineyard, Esq.
555 Market Street
San Francisco, CA 94120-7141

Conestoga Foundry
Henry Witmeyer, President
Hill Drive & West State Street
Hamburg, PA 19526

Conestoga Fuel
General Manager
1145 Elizabeth Avenue
P.O. Box 4665
Lancaster, PA 17604

Donald B. Kelly
2008 Federal Street
Camden, NJ 08105

Wilmington
E. I. DuPont de Nemours & Company, Inc. (302) 774-8720
Pamela Meitner, Esq., Legal Department
1007 Market Street
Wilmington, Delaware 19898

EC Barnes Incorporated
Roy Fahnestock, Manager
8632 Lincoln Way, West
St. Thomas, PA 17252

EJ Koenig
Edward Koenig, President
230 Rte. 130 South
Bordentown, NJ 08505

Henry B. Kessler, Esq.
Kessler, Tutek & Gladfelter
325 Farnsworth Avenue
P.O. Box 111
Bordentown, NJ 08505-0111

First State Steel Drum Company
John Ryan, Owner
4030 New Castle Avenue
New Castle, DE 19720

Thomas S. Lodge, Esq.
Connally, Bove, Lodge, & Hutz
1220 Market Building
P.O. Box 2207
Wilmington, DE 19899

Flippo Oil
Harry F. Flippo, President
3030 South Main Street
Harrisonburg, VA 22801-2694

Fritch Fuel Company
Lowell Brogan, Vice President
P.O. Box 1037
116 River Street
Bethlehem, PA 18016

Gilbert Spruance Co.
Richard T. Greene
Richmond & Tioga Streets
Philadelphia, PA 19134

Herb Toy, Incorporated
Box 245
Franklinville, NJ 08322

Industrial Solvents and Chemical Co.
Andrew P. Rawicz
210 Stevens Road
York Haven, PA 17370

JT Waring and Sons
Vincent Warring, President
4545 South Street
Capitol Heights, MD 20743

JTM Drum
P.O. Box 169
Sayerville, NJ 08872

Jay Gress, Incorporated
Jay Gress, President
1225 W. Ridge Pike
Conshohocken, PA 19428

Kessler Chemical, Inc.
Barry Kessler, President
270 Street Road
New Hope, PA 18938

Lehigh Gas and Oil
Roman Baran, Manager
80 Broad Street
Beaver Meadows, PA 18216

Lightman Drum Company, Inc.
Jerome Lightman, President
Rt. 73, at 12 Mile Marker
Cedarbrook, NJ 08018

Lyondell Petrochemical Corp.
C. T. Corp. Systems
123 South Broad Street
Philadelphia, PA 19134

Mauger and Company, Incorporated
1015 Baltimore Pike
Media, PA 19063

Mobil Oil Corporation
Shari Gulbrandsen, Esq
3225 Gallows Road
Fairfax, VA 22037-0001

National Solvents
Rodger Kunis, Vice President
8735 Old Route 13
Tullytown, PA 19007

Norton Petroleum
Barry Norton, President
290 Possum Park Road
Newark, DE 19171

Petroleum Products
Tony Minite, General Manager
P.O. Box 2621
900 Eisenhower Boulevard
Harrisburg, PA 17105

Petrolite Corporation
Ron Stephenson, Manager
4th and Saville Avenue
Eddystone, PA 19013

Pioneer Oil Company
Morton Segal, Vice President
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Oaklyn, NJ 08107-1451

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Richard Keyser, Vice President
899 Mearns Road
Warminster, PA 18974

Jeffrey A. Smith, Esq.
Clark, Ladner, Fortenbaugh & Young
1818 Market Street, 32nd Floor
Philadelphia, PA 19103

*Will keep in touch
Keep me aware of event*

*Training & public
responsibility*

241-1833

Let me

Reliable Recyclers
Stanley Miller, President
Reliable Industries, Inc.
178 Greenfield Road
Lancaster, PA 17601

Rhodes Drums
Dusty Rhodes, Owner
2000 Federal Street
P.O. Box 2571
Camden, NJ 08105

Robert O'Donnell
607 Wynne Road
Springfield, PA 19064

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C.T. Corporate Systems
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1715 East Tremont St.
Box 505
Allentown, PA 18105

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237 Mill Street, P.O. Box 272
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Wyncote, PA 19095

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P.O. Box 2225
500 West Dutton Mill Road
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Marine Operations
500 West Dutton's Mill Rd.
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Aston, PA 19014-2224

Superior Drum
218 Crafton Avenue
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Tastykake, Inc.
Nelson G. Harris, President
2801 Hunting Park Avenue
Philadelphia, PA 19129
Attn: Paul G. Diorio

Tunnel Barrel and Drum
85 Triangle Boulevard
Carlstadt, NJ 07072

Philip M. Saginario, Esq.
126 Market Street
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USX Corporation (US Steel Corporation)
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320 Brown Street
Philadelphia, PA 19133

William Jones and Sons, Inc.
238 Liberty Street
Camden, NJ 08401

Witco Chemical Corporation
Samuel Thomas, Plant Manager
3300 West 4th Street
Trainer, PA 19013

William C. Grabarek, Esq.
2701 Lake Street
Melrose Park, IL 60160

Zenith Products
A. James Pruffe, President
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014
Attn: Briggs Pletcher

O.F. Zurn Company
John Ballinger, President
2136 North Broad Street
Philadelphia, PA 19132

Metro Container Corp.
Sidney Levy
2nd & Price Streets
Trainer, PA 19013

Metro-Enterprises Container Corp.
Sidney Levy
2nd & Price Streets
Trainer, PA 19013

Mr. Maslow

Drum Sales

Metro Container Corp

985-6100 [Pete Cabrey]

11/25

55 gal
55 gal

17/H
closed

9-Plastic 86-
w/o top
 $@ \$3.00 \times 95 = 258$
 $@ \$2.00 \times 52 = 104$
Due $= \$322$
352

12/27 [55 gal
55 gal

17/H
closed @ 2.00

$@ \$3.00 \times 40 = 120$
 $@ \$2.00 \times 48 = 96$
Due $= \$216$

Pending
Inspection

42 Head Fill Drums $@ \$2.00 = 84$
25 17 H Drums $@ \$3.00 = 75$
5 Open Head Drums $@ \$1.00 = 5$
\$164

11/25 = 352
 12/27 = 164
 5/22 = 359
875

5/22 110 174
 48 closed

(67 missing Top Ring - 67 x \$2.00 = 134
 - \$1.00 eq) 43 x \$3.00 = 129
 @ \$2.00 = 96
\$ 359

RECEIVING RECORD

7164

Metro Cont. 485-6100

RECEIVED FROM ZENITH METALS
ADDRESS Ashton PA

PURCHASE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE 11-25-85
VIA # 263 trailer	PREPAID	COLLECT

1	95	Open	55 gallon drum @ \$3.00	\$258
2		Heads	40 w/o Tops @ \$.50	40
3				218
4				
5	52	Closed	55 gallon drum @ \$2.00	\$104
6		Heads		
7				\$322
8				
9				
10	147		total drums	
11			DRUMS HAVE TO BE	
12			Inspected	

REMARKS: CONDITIONS, ETC.

[Signature]

NO. PACKAGES	WEIGHT	RECEIVED BY PMM	CHECKED BY	DELIVERED TO
--------------	--------	---------------------------	------------	--------------

Rediform®

2H 260

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

RECEIVING RECORD

7378

METRO CONTAINER

RECEIVED FROM
Zenith Metal
ADDRESS
Hight Level Inel Park

PURCHASE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE
		12-27-85
VIA	PREPAID	COLLECT
T-166		

1		
2	48	55 gal Bung Drum
3		
4	40	55 gal Open Head
5		
6		
7		count + Imp due
8		
9		
10		
11		
12		

REMARKS: CONDITIONS, ETC.

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO

Rediform®

2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE

RECEIVING RECORD
METRO Container 7170
215-485-6100

RECEIVED FROM <i>Zenith</i>
ADDRESS <i>Aston PA</i>

PURCHASE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE <i>6-9-86</i>
VIA <i>#5-45</i>	PREPAID	COLLECT

1	17	55	gal H.F.
2			
3	2	55	gal Open Heads
4			
5			
6	19		total
7			
8			
9			DRUMS HAVE TO BE
10			
11			Inspected
12			

REMARKS: CONDITIONS ETC.
<i>[Signature]</i>

NO. PACKAGES	WEIGHT	RECEIVED BY <i>FM</i>	CHECKED BY	DELIVERED TO
--------------	--------	--------------------------	------------	--------------

RECEIVING RECORD

4263

RECEIVED FROM ZENITH		
ADDRESS Marcus Hook PA.		
PURCHASE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE 10/22/86
VIA		PREPAID COLLECT
[REDACTED]		
1	100	Drums
2		
3		Subject to wsp.
4		
5		
6		
7		
8		
9		[Signature]
10		
11		
12		[Signature]
REMARKS: CONDITIONS, ETC.		

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO

REDIFORM
2H 260

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

RECEIVING RECORD

6142

RECEIVED FROM <i>Zenith</i>		
ADDRESS <i>Aston PA.</i>		
PURCHASE ORDER NO. OR RETURNED CODES	FREIGHT BILL NO.	DATE <i>9/20/87</i>
VIA <i>TE# 223</i>		PREPAID <input checked="" type="checkbox"/> COLLECT <input type="checkbox"/>
1	<i>17</i>	<i>17 H' OPEN HEADS</i>
2	<i>8</i>	<i>Bong type drums</i>
3	<i>67</i>	<i>SCRAP DRUMS</i>
4		
5		
6		<i>Phyll Borman</i>
7		
8		
9		
10		<i>Tom Stepland</i>
11		
12		

REMARKS: CONDITIONS, ETC.

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO

NEEDFORM

2H 260

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
12/30/87	2031	114.00		114.00
12/30	TOTALS	114.00		114.00

Zenith PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

3-7586/2380

12/30/87

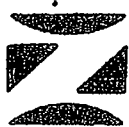
9/28/87

CHECK
NO. 00007PSFS
Maritor Financial Group
PHILADELPHIA, PA114.00
AMOUNT**PAY**

TO THE ORDER OF

METRO CONTAINER CORP.
SECOND & PRICE STS
BOX A
TRAINER PA 19013**NON-NEGOTIABLE**

AUTHORIZED SIGNATURE



Zenith PRODUCTS CORPORATION

200 Commerce Drive, Aston, Pennsylvania 19014 (215) 485-4700

8/30/87

ATTN: ACCOUNTS PAYABLE DEPT
METRO CONTAINER
P.O. BOX A
TRAINER PA 19016

GOOD MORNING:

Leopard

GENTLEMEN

THE FOLLOWING OPEN INVOICES ARE CONSIDERABLY BEYOND OUR TERMS OF 1% 10
NET 30 :

DATE	INVOICE	STORE	AMOUNT
6/24/87	079017 **		355.00
		CURRENT \$	
		TOTAL	355.00

9-2-87

WE ARE WRITING FOR THE SECOND TIME CONCERNING THOSE ITEMS WITH TWO
ASTERISK (**). PLEASE REMIT BY RETURN MAIL. FURTHER DELAY COULD
JEOPARDIZE YOUR CREDIT STANDING WITH OUR FIRM.

VERY TRULY YOURS
ZENITH PRODUCTS CORP

90005 A

KEYPUNCHED FOR
SEP 03 1987

COMPUTER RUN

DOLPH PEDICONE
CREDIT MANAGER

*Please
if there
is an error
let us know
now
- Duke for*

ORDER	1669
DATE	8/27/87
TIME	1630Z
EXTENSION	
	355.00
	8/27/87



Metro-Enterprise Container Corp.

2031

Mailing Address:
POST OFFICE BOX A
CHESTER, PENNSYLVANIA
215-485-6100

SHIPPED
TO

DATE 7/30/87

ADDRESS

CITY

Zenith Metal Products

200 Commerce Drive

Aston PA 19014

201061

PLEASE PAY FROM THIS INVOICE. NO MONTHLY STATEMENT WILL BE SENT.

TERMS - NET 30 DAYS

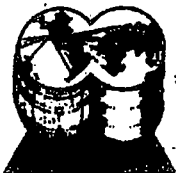
ORDERED BY:

TAKEN BY:

DATE ORDERED		APPROX DATE PROMISED		CUSTOMER ORDER				REQUISITION #		DRIVER		TRAILER	
				Memo 6142									
QUANTITY ORDERED (Approx)	QUANTITY SHIPPED	55 GAL.	30 GAL.	TYPE DRUM SPEC. #	TYPE HEAD	TYPE RING	LINED	BLASTED	GASKETS	BOLTS & NUTS	ASSEMBLED	UNIT PRICE	AMOUNT
312	67	X		SCRAP DRUMS BURNED AND CRUSHED								\$7.00	\$469.00
<div>VENDOR 1669 INVOICE 2031 G/L ACCT. 6300 REV. 073082 GROSS 469.00 DUE DATE 082787 PREPAID CHECK</div> <div>RECEIVER PRICE EXTENSION</div>													
PAY THIS AMT ▶ \$469.00													
SALE		INVENTORY		COLOR OF BODY		COLOR OF HEAD		KEYPUNCHED FOR SEP 03 1987 COMPUTER RUN					

RECEIVED BY:

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER DELIVERY RECEIPT SIGNED



Metro Container Corp

POST OFFICE BOX A SECOND & PRICE STREETS TRAINER, PENNSYLVANIA 19016
(215) 627-7288 TELEPHONES (215) 494-8200



December 17, 1987

ZENITH METALS
300 Commerce Drive
Aston, PA 19014

Gentlemen:

Regretfully we must advise that we have filed for Chapter XI protection under the bankruptcy laws. This action had to be taken without prior notice in order to protect the unsecured creditors, our employees and the continuity of our operation from an unexpected precipitous action taken by our secured lenders.

Our expectation is that we will continue operating both Metro and Metro-Enterprise and hope that you will be willing to continue your relationship with us. We hope to move through this unfortunate period as quickly as possible and emerge in sound condition.

Should you have any questions, please do not hesitate to call either Sidney Levy or myself.

Very truly yours,

Lewis Maslow
C.E.O.

Sidney Levy
President

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014



INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
5/14/87	1000	119.00		119.00
1000	TOTALS	119.00		119.00

Zenith PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

3-7868/2360

CHECK
NO.

02401

5/14/87



Meritor Financial Group
PHILADELPHIA, PA

2401

AMOUNT

PAY

TO THE ORDER OF

\$119.00

MEYER CONTAINER CORP.
SECOND & PRICE STS
BOX A
TRAINER

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

⑆02401⑆ ⑆236075663⑆ 11 105466324⑆

METRO CONTAINER CORP.
P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

INVOICE

Invoice No. 1838

SALES PERSON	DATE OF INVOICE 4/14/87
SHIP TO ZENITH METAL PRODUCTS 200 COMMERCE DRIVE HIGHLAND IND PARK ASTON, PA 19014	

TO:
ZENITH METAL PRODUCTS
200 COMMERCE DRIVE
HIGHLAND IND PARK
ASTON, PA 19014

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	PO BOX	PORT	TERMS	YOUR ORDER NUMBER																								
231260	4/14/87	YOUR TRUCK			N 10 DAYS																									
QUANTITY	DESCRIPTION				UNIT PRICE	AMOUNT																								
17	320 55 GALLON HF DRUMS BLACK AND WHITE				7.00	119.0																								
<div>5-5-87 Mike: PROBLEM WITH <input type="checkbox"/> PRICE <input type="checkbox"/> QUANTITY <input checked="" type="checkbox"/> purchase order? VERIFY AND RETURN BY 5-6-87 Joanne</div> <div>OK G/L 73-85</div> <div><table border="1"><tr><td>VENDOR</td><td>1669</td><td>RECEIVED</td></tr><tr><td>INVOICE</td><td>1838</td><td>PRICE</td></tr><tr><td>G/L ACCT.</td><td>2385</td><td>EXTENSION</td></tr><tr><td>INV. DATE</td><td>04/14/87</td><td></td></tr><tr><td>DISC. %</td><td></td><td></td></tr><tr><td>GROSS</td><td>119.00</td><td></td></tr><tr><td>DUE DATE</td><td>050787</td><td></td></tr><tr><td>PREPAID CHECK</td><td></td><td></td></tr></table></div> <div><div>ORIGINAL</div><div>Thank You</div><div>TOTAL \$119.0</div><div>412-57</div></div>							VENDOR	1669	RECEIVED	INVOICE	1838	PRICE	G/L ACCT.	2385	EXTENSION	INV. DATE	04/14/87		DISC. %			GROSS	119.00		DUE DATE	050787		PREPAID CHECK		
VENDOR	1669	RECEIVED																												
INVOICE	1838	PRICE																												
G/L ACCT.	2385	EXTENSION																												
INV. DATE	04/14/87																													
DISC. %																														
GROSS	119.00																													
DUE DATE	050787																													
PREPAID CHECK																														

RECEIVING RECORD

6142

RECEIVED FROM Zenith			
ADDRESS Aston PA.			
PURCHASE ORDER NO. OR RETURNED GOODS		FREIGHT BILL NO.	DATE 9/20/87
VIA T#225		PREPAID <input checked="" type="checkbox"/> COLLECT <input type="checkbox"/>	
1	17	17 H' OPEN HEADS	
2	8	Bong type drums	
3	67	Scrap drums	
4		<i>Phyll Borman</i>	
5			
6			
7			
8		<i>Tom Stepland</i>	
9			
10			
11			
12			
REMARKS: CONDITIONS, ETC.			
NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY
		DELIVERED TO	

REDIFORM
2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE

4263

FD-302a
2H 260

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

RECEIVING RECORD

7378

METRO CONTAINER

RECEIVED FROM Zenith Metal			
ADDRESS Hightland Ind Park			
PURCHASE ORDER NO. OR RETURNED GOODS		FREIGHT BILL NO.	DATE 12-27-85
VIA T-166		PREPAID	COLLECT
1			
2	48		55 gal Bung Dura
3			
4	40		55 gal Open Head
5			
6			
7			count + imp due
8			
9			
10			
11			<i>[Signature]</i>
12			
REMARKS: CONDITIONS, ETC.			
NO. PACKAGES WEIGHT		RECEIVED BY	CHECKED BY
		DELIVERED TO	

Rodiform®
2H 260

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

RECEIVING RECORD

7164

Metro Cont. 485-6100

RECEIVED FROM ZENITH METALS
ADDRESS Ashton PA

PURCHASE ORDER NO. OR RETURNED 00000	FREIGHT BILL NO.	DATE 11-25-85
VIA # 263 tanker	PREPAID	COLLECT

1	95	Open	55 gallon drum @ \$3.00 = \$258
2		Heads	40 w/o Tops - \$50 = 40
3			218
4			
5	52	Closed	55 gallon drum @ \$2.00 = \$104
6		Heads	
7			\$322
8			
9			
10	147		Total drums
11			DRUMS HAVE to be
12			Inspected

REMARKS: CONDITIONS, ETC.

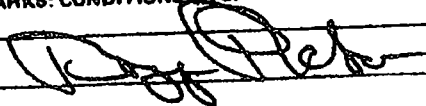
[Signature]

NO. PACKAGES	WEIGHT	RECEIVED BY Firm	CHECKED BY	DELIVERED TO
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Rediform ®
2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE

RECEIVING RECORD 7170
 METRO Container
 215-485-6100

RECEIVED FROM		Zenith	
ADDRESS		Aston Pa	
PURCHASE ORDER NO. OR RETURNED		FREIGHT BILL NO.	
00000			
DATE		6-9-86	
VIA		PREPAID COLLECT	
#5-45			
1	17	55	gal H.F.
2			
3	2	55	gal Open Heads
4			
5			
6	19		total
7			
8			
9			DRUMS HAVE TO BE
10			INSPECTED
11			
12			
REMARKS: CONDITIONS ETC.			
			
NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY
		F.M.	
		DELIVERED TO	

Rediform®
 2H 260

BE SURE TO MAKE THIS
 RECORD ACCURATE AND COMPLETE



200 COMMERCE DRIVE ASTON, PA 19014-3293

INVOICE NO. 070650 N/I

TERMS -

30 DAYS NET

**NO
ANTICIPATION
ALLOWED**

D/f

CUST. NUMBER		DEPT.	REP.	P.O. NUMBER	CARRIER	
QTY	PIECES	DESCRIPTION		UNIT	PRICE	AMOUNT
	110	17H Open Head			3.00	\$330.00
	16	Closed Head			2.00	\$ 32.00
<p>Your Truck P/U on 3/30/87 Ticket # 6110</p>						

RECEIVING RECORD

4386

Metko

RECEIVED FROM *Zenith Metal*

8-17-41

BE SURE TO MAKE THIS
RECORD AS A TEAM AND NOT IT.



PRODUCTS CORPORATION

1000 COMMERCE DRIVE ASTON, PA 19014-3293

Container Corp.
Price Street
Aston, PA 19016

TERMS

30 DAYS NET

NO

ANTICIPATION
ALLOWED

D/I

4/5/85

QUANTITY	DESCRIPTION	REP.	DEPT.	P.O. NUMBER	CARRIER
43	Open Head Drums				3.00 129.00
67	Open Head Drums Tops Missing				2.00 134.00
28					2.00 96.00
TOTAL					359.00

2016

Total

359.00
359.00
359.00

359.00

Press of

MOORE BUSINESS FORMS, INC. S 431087625

ORIGINAL

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

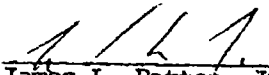
IN RE:)
METRO-ENTERPRISE CONTAINER) Case No. 87-521
CORPORATION,)
Debtor.)

NOTICE

PLEASE TAKE NOTICE that on January 22, 1988, this Court entered an Order approving a Stipulation and Order Regarding Use of Cash Collateral (the "Stipulation") allowing the captioned debtor to use cash collateral of Wilmington Trust Company and granting to Wilmington Trust Company, subject to the provisions of this notice, a post petition lien against assets of the captioned estate pursuant to 11 U.S.C. § 364(c)(3) (the "Lien") and a super-priority claim (the "Super-priority Claim") for all sums owed as additional protection pursuant to 11 U.S.C. § 364(c)(1). A copy of the Stipulation will be provided upon written request sent to James L. Patton, Jr., Young, Conaway, Stargatt & Taylor, 11th Floor, Rodney Square North, P.O. Box 391, Wilmington, Delaware 19899-0391.

PLEASE TAKE FURTHER NOTICE that a party having an objection to the granting of the Lien or the Super-priority Claim must request a hearing and file a written objection with the Court and serve it upon the undersigned counsel on or before May 25, 1987. If no objection is filed, the Order approving the Stipulation will become final as to all terms and conditions therein, including the granting of the Lien and Super priority Claim, without further order of this Court.

Dated: 3/29/88


James L. Patton, Jr.
YOUNG, CONAWAY, STARGATT & TAYLOR
11th Floor, Rodney Square North
P.O. Box 391
Wilmington, DE 19899-0391
(302) 571-6684
Attorney for Debtor


IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE:)
METRO CONTAINER CORPORATION,) Case No. 87-520
Debtor.)

NOTICE

PLEASE TAKE NOTICE that on January 22, 1988, this Court entered an Order approving a Stipulation and Order Regarding Use of Cash Collateral (the "Stipulation") allowing the captioned debtor to use cash collateral of Wilmington Trust Company and granting to Wilmington Trust Company, subject to the provisions of this notice, a post petition lien against assets of the captioned estate pursuant to 11 U.S.C. § 364(c)(3) (the "Lien") and a super-priority claim (the "Super-priority Claim") for all sums owed as additional protection pursuant to 11 U.S.C. § 364(c)(1). A copy of the Stipulation will be provided upon written request sent to James L. Patton, Jr., Young, Conaway, Stargatt & Taylor, 11th Floor, Rodney Square North, P.O. Box 391, Wilmington, Delaware 19899-0391.

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James L. Patton, Jr.
YOUNG, CONAWAY, STARGATT & TAYLOR
11th Floor, Rodney Square North
P.O. Box 391
Wilmington, DE 19899-0391
(302) 571-6684
Attorney for Debtor

Dated: 3/29/88

Metro-Enterprise Container Corp.

2nd & PRICE ST. • TRAINER, PA 19013

(215) 485-6100

CUSTOMER'S ORDER NO. 6283 DATE 3-5-88

NAME _____

ADDRESS

CITY & STATE

SHIPPED VIA

[illegible]

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

11317

3058

REC'D BY

METRO ENTERPRISE
TRAINER, PA

RECEIVED FROM Zenith Products
ADDRESS Ashton PA.

PURCHASE ORDER NO. OR RETURNED
GOODS

FREIGHT BILL NO.

DATE

3/8/88

VIA

T# 279

PAY TO ORDER OF
PREPAID COLLECT

QUANTITY	ITEM NUMBER	DESCRIPTION
1 61		17 H' OPEN HEADS
2 25		Bung type DRUMS
3 25		SCRAP DRUMS
4		
5		ALL DRUMS SUBJECT TO COUNT
6		AND INSPECTION BY METRO
7		
8		Ralph Borman
9		
10		J. Steplford
11		
12		

REMARKS: CONDITIONS, ETC.

NO. PACKAGES WEIGHT RECEIVED BY CHECKED BY DELIVERED TO

REDIFORM
2H 260

BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE

Metro-Enterprise Container Corp.

INVOICE NO

3058

Mailing Address:
POST OFFICE BOX A
CHESTER, PENNSYLVANIA
215-485-6764

DATE 3/8/88

Zenith Metal
200 Commerce Drive
Aspen PA 19014

201061

SHIPPED
TO —

ADDRESS

CITY

PLEASE PAY FROM THIS INVOICE. NO MONTHLY STATEMENT WILL BE SENT.

TERMS - NET 30

[illegible]

RECEIVED

RECEIVED BY:

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER DELIVERY

CREDIT DEP

Metro-Enterprise Container Corp.

Mailing Address:
POST OFFICE BOX A
CHESTER, PENNSYLVANIA
215-485-6100

DATE 12/19/47

Zenith Products

~~200 Commerce Dr.~~

Aston PA 19014

SHIPPED

10

ADDRESS

CITY

PLEASE PAY FROM THIS INVOICE. NO MONTHLY STATEMENT WILL BE SENT.

TERMS - NET 30 DAYS

[illegible]

RECEIVED BY:

KEYPUNCHED FOR

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER DELIVERY RECEIPT SIGNED

APR 08 1988

COMPUTER RUN

VENDOR 1669 RECEIVER _____
INVOICE 3058 PRICE _____
T. ACCT. 6300 EXTENSION 600
DATE 030888
% _____
DUE DATE 175.00
PREPAID CHECK 040788

ENDORSEMENT: 1669
PRICE: 2671
EXTENSION: 6300
TOTAL: 20987
DATE: 285.00
CHECK: 040788

BOF14C
(2/81)

United States Bankruptcy Court

For the RECEIVED District of DELAWARE
ZENITH PRODUCTS

In re METRO CONTAINER CORP.,

(E.ID.No. 23-2231601)

Case No. 87-520

Debtor

ORDER FOR MEETING OF CREDITORS AND FIXING TIMES FOR FILING COMPLAINTS TO DETERMINE DISCHARGEABILITY OF CERTAIN DEBTS, COMBINED WITH NOTICE THEREOF AND OF AUTOMATIC STAY

An order for relief under 11 U.S.C. chapter 11 having been entered on a petition filed by ~~METRO CONTAINER CORP.~~

METRO CONTAINER CORP.

of

P.O. Box A, 2nd and Price Streets
Trainer, Pennsylvania 19016

on DECEMBER 7, 1987

, it is ordered, and notice is hereby given, that:

1. A meeting of creditors pursuant to 11 U.S.C. §341(a) has been called by R. M. Leonard, U.S. Trustee, and scheduled for the 8th day of JANUARY, 1988 at 1:00 o'clock p.m. at U.S. COURT HOUSE, Rm. 1306 1st FLOOR, 844 KING STREET, WILMINGTON, DELAWARE.
2. The debtor shall appear in person (or, if the debtor is a partnership, by a general partner, or, if the debtor is a corporation, by its president or other executive officer) at that time and place for the purpose of being examined.
3. A complaint objecting to the discharge of the debtor shall be filed not later than the first date set by the court for the hearing on confirmation of the plan of which you will receive notice.
4. *[If the debtor is an individual]* is fixed as the last day for the filing of a complaint to determine the dischargeability of a debt pursuant to 11 U.S.C. §523(c).

You are further notified that:

The meeting may be continued or adjourned from time to time by notice at the meeting, without further written notice to creditors.

At the meeting the creditors may file their claims. *[if appropriate]* designate a person to supervise the meeting, examine the debtor, and transact such other business as may properly come before the meeting.

As a result of the filing of the petition, certain acts and proceedings against the debtor and his property are stayed as provided in 11 U.S.C. §362(a).

[If the debtor is an individual] If no complaint to determine the dischargeability of a debt under clause (2), (4) or (6) of 11 U.S.C. §523(a) is filed within the time fixed therefor as stated in subparagraph 4 above, the debt may be discharged.

The debtor *[or trustee]* has filed or will file a list of creditors and equity security holders pursuant to Rule 1007. Any creditor holding a listed claim which is not listed as disputed, contingent, or unliquidated as to amount, may, but need not, file a proof of claim in this case. Creditors whose claims are not listed or whose claims are listed as disputed, contingent, or unliquidated as to amount and who desire to participate in the case or share in any distribution must file their proofs of claim.

ANY CREDITOR NOTIFIED THAT HIS CLAIM IS DISPUTED, CONTINGENT OR UNLIQUIDATED MUST FILE A PROOF OF CLAIM ON OR BEFORE THE FIRST DATE SET FOR A DISCLOSURE STATEMENT HEARING.

Unless the court extends the time, any objection to the debtor's claim of exempt property (Schedule B-4) must be filed within 30 days after the conclusion of the meeting of creditors.

[If appropriate]

of

has been appointed trustee of the estate of the above-named debtor.

FOR THE COURT

Dated: December 9, 1987

Catalyn C. Ranczewski
Clerk, Bankruptcy Court



Commercial Loan Division

Personal Direct Dial

302 651 1575

December 1, 1987

Zenith Metal Products Corp.
200 Commerce Drive
Aston, PA 19014

Attn: Accounts Payable

RE: Metro Container Corporation
or Metro Enterprise Container Corporation

Dear Sir or Madam:

This is to advise you that Wilmington Trust Company holds a perfected, first security interest in all accounts receivable of the above entities to secure certain loans made by Wilmington Trust Company.

Please be advised that Wilmington Trust Company has exercised its rights upon default under the Uniform Commercial Code to collect the accounts receivable of Metro Container Corporation and Metro Enterprise Container Corporation directly. NOTICE IS HEREBY GIVEN that all payments by you to Metro Container Corporation and Metro Enterprise Container Corporation MUST BE sent directly to:

Wilmington Trust Company
Rodney Square North
Wilmington, DE 19890
Attn: Francis J. Ackerman

Your failure to comply with this notice may subject you to liability.

Very truly yours,

WILMINGTON TRUST COMPANY

Francis J. Ackerman
Vice President

FJA:lpk

VENDOR MASTER ADD - CHANGE

APφ 1

41-ADD

42-CHANGE

ACTION

VENDOR

Number

VENDOR NAME

1-2

--	--

3.7

--	--	--	--	--

8-32

[illegible]

7

ADDRESS LINE #1

33-57

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----

З

ALPHABETIC CODE

58-60

2	1	1
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KEYPUNCHED FOR
DEC 08 1987
COMPUTER RUN

DEC 08 1987

COMPUTER RUN

VENDOR MASTER CHANGE

APØ 1

VENDOR NUMBER

ADDRESS LINE #2

12
43

3-7

[illegible]

ADDRESS LINE #3

33-50 (city)

					F	J								
--	--	--	--	--	---	---	--	--	--	--	--	--	--	--

7
51-52 (STATE)

ZIP Code

STANDARD TERMS

53-57 Z

65-79

7	8	7	6	5	4	3	2	1	0	9	8	7	6	5	4	3	2	1	0
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---



WILMINGTON
TRUST

Commercial Loan Division

Personal Direct Dial

302 651 1575

December 1, 1987

Zenith Metal Products Corp.
200 Commerce Drive
Aston, PA 19014

Attn: Accounts Payable

RE: Metro Container Corporation
or Metro Enterprise Container Corporation

Dear Sir or Madam:

This is to advise you that Wilmington Trust Company holds a perfected, first security interest in all accounts receivable of the above entities to secure certain loans made by Wilmington Trust Company.

Please be advised that Wilmington Trust Company has exercised its rights upon default under the Uniform Commercial Code to collect the accounts receivable of Metro Container Corporation and Metro Enterprise Container Corporation directly. NOTICE IS HEREBY GIVEN that all payments by you to Metro Container Corporation and Metro Enterprise Container Corporation MUST BE sent directly to:

Wilmington Trust Company
Rodney Square North
Wilmington, DE 19890
Attn: Francis J. Ackerman

Your failure to comply with this notice may subject you to liability.

Very truly yours,

WILMINGTON TRUST COMPANY

Francis J. Ackerman
Vice President

FJA/lmh

Zenith PRODUCTS CORPORATION

200 COMMERCE DRIVE ASTON, PA 19014-3293

INVOICE DATE

INVOICE NO. 079017 N/I

SOLD TO

Metro Container
P.O. Box A
Trainer, PA 19016

SHIP TO

TERMS

30 DAYS NET

NO
ANTICIPATION
ALLOWED

D/I

7/14/87

DEPT.

Unified Data Products Corporation

20434

CUST. NUMBER		REP.	P.O. NUMBER		CARRIER
90005					
99	17H Open Head Drums			3.00	297.00
29	Bung Type Drums			2.00	58.00
TOTAL					355.00
Picked Up on 6/24/87 #6136					
CLAIMS FOR DAMAGED GOODS - IF THESE GOODS ARE RECEIVED SHORT OR IN DAMAGED CONDI- TION REQUEST FREIGHT OR EXPRESS AGENT TO MARK BN TO THAT EFFECT OTHERWISE YOU HAVE NO CLAIM AGAINST TRANSPORTER WHO RECEIVED YOUR SHIPMENT FROM US IN GOOD ORDER ALL ADJUSTMENTS TO BE MADE WITHIN 5 DAYS AFTER RECEIPT OF GOODS					
PLEASE PAY THIS AMOUNT					355.00

1 ORIGINAL

VED

[Signature]

16

AN

Total

97.00

8.00

5.00

Address of

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014



INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
12/04/87	2667	344.00		344.00
12/04/87	2671	285.00		285.00
9/14/87	19273	226.00-		226.00-
12/04/87	120467	350.00-		350.00-
1669	TOTALS	1005.00		1005.00

Zenith PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

3-7566/2380

CHECK
NO. 012408PAY
TO THE ORDER OF

12/22/87

Meritor Financial Group
PHILADELPHIA, PA

12628

AMOUNT

\$1005.00

WILMINGTON TRUST CO.
RODNEY SQUARE NORTH
WILMINGTON DE 19890
ATTN: FJ ACKERMAN 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

007424 PM 1 10 1988 1 10 1988 1 10 1988

*Master Station
Wilmington, Tenn*

VENDOR	1669	RECEIVER	
INVOICE	2671	PRICE	
G/L ACCT.	6300	EXTENSION	
INV. DATE	120487		
DISC. %			
GROSS	225.00		
DUE DATE	121087		
PREPAID CHECK			

VENDOR	1669	RECEIVER	
INVOICE	2667	PRICE	
G/L ACCT.	6300	EXTENSION	
INV. DATE	120487		
DISC. %			
GROSS	225.00		
DUE DATE			
PREPAID CHECK			

VENDOR	1669	RECEIVER	
INVOICE	120487	PRICE	
G/L ACCT.	6300	EXTENSION	
INV. DATE	120487		
DISC. %			
GROSS	350.00		
DUE DATE	121087		
PREPAID CHECK			

VENDOR	1669	RECEIVER	
INVOICE	2922	PRICE	
G/L ACCT.	6300	EXTENSION	
INV. DATE	121487		
DISC. %			
GROSS	226.00		
DUE DATE	121087		
PREPAID CHECK			

KEYPUNCHED FOR
DEC 18 1987
COMPUTER RUN







METRO CONTAINER CORP.

P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

INVOICE

TO:

Zenith Products
200 Commerce Drive
Aston PA

SALESPERSON	DATE OF INVOICE
	12/4/87
SHIP TO	
CREDIT	

12/4/87					
104	320	55 Gallon 17H OH Drums	\$3.00	\$312.00	
19			2.00	38	
				<u>350</u>	
			CREDIT		
			TOTAL	\$312.00	

ORIGINAL

Thank You

PURCHASE MEMO

Metro-Enterprise Container Corp.

ANDERSON, J. R. RAINIER, PA 1901

125-485-4190

Nāme

အုပ်ချုပ်ရေး

City

Ship Via

[illegible]

1420

13753

REC'D BY

LEVIN PRODUCTS CORPORATION

200 COMMERCE DRIVE ASTON, PA 19014-3293

INVOICE DATE

INVOICE NO. 079273 N/I

9-14

Metro Container
P.O. Box A
Trainer, PA 19016

S
O
D
T
O

S
H
I
P
T
O

TERMS

30 DAYS NET

NO
ANTICIPATION
ALLOWED

D/I

9/11/87

DEPT.

CUST. NUMBER 90005		REP.	P.O. NUMBER	CARRIER		
CTNS.	PIECES	DESCRIPTION		WEIGHT	PRICE	AMOUNT
	58	17H Drums			3.00	174.00
	26	011 Type Drums			2.00	52.00
		TOTAL:				226.00
Pick Up on 8/27/87 - #4386						
<div>Change to 170 be delivered from Vendor. Judy 12-11-87</div>						

Pick Up on 9/27/87 - #4386

*Charge to
H to
be deducted
from Vendor's
Invoice
July
12-11-87*

CLAIMS FOR DAMAGED GOODS - IF THESE GOODS ARE RECEIVED SHORT OF A DAMAGED CONDI-
TION REQUEST FREIGHT OR EXPRESS ADJUST TO MARKET TO THAT EFFECT. OTHERWISE YOU HAVE
NO CLAIM AGAINST TRANSPORTER WHO RECEIVED YOUR SHIPMENT FROM US. IN GOOD ORDER ALL
ADJUSTMENTS TO BE MADE WITHIN 30 DAYS AFTER RECEIPT OF GOODS

PLEASE PAY
THIS AMOUNT

226.00

RECEIVING RECORD

8209

RECEIVED FROM	ZENITH PRODUCTS
ADDRESS	

PURCHASE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE 3/20/86
VIA		PREPAID COLLECT

QUANTITY	UNIT	DESCRIPTION
1	20	RAW HF
2		
3		12-ARCO
4		2-MOBIL
5		5-BP
6		
7		
8		
9		
10		
11		
12		

RECEIVED
MAR 19 1986
METRO CONTAINER CORP.

REMARKS: CONDITIONS, ETC.

RECEIVED BY: [Signature] DATE: 3/20/86

Form 9

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
3/20/65	6826	140.00		140.00
1669	TOTALS	140.00		140.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

62-4
311

CHECK
NO.

22590

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

22590

4/20/65

PAY

AMOUNT

TO THE ORDER OF

140.00

METRO CONTAINER CORP.
SECOND & PRICE STS
BOX A
PHILADELPHIA

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

METRO CONTAINER CORP.

P.O. Box A
Second & Price Streets.
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

TO:

Zenith Metal Products
200 Commerce Drive
Highland Ind. Park
Aston, Pa. 19014

NO. 8826

SALESPERSON	DATE OF INVOICE
	3/20/86
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	PP	F.O.B. POINT	TERMS	YOUR ORDER NUMBER	UNIT PRICE	AMOUNT
> QUANTITY	CODE					Net			
20	320	55 Gallon HF Drums R & R						\$7.00	\$140.00
		PAINTED BLACK & WHITE							
<div><div>VENDOR _____ RECEIVER _____</div><div>INVO. _____ PRICE _____</div><div>DATE _____ EXTENSION _____</div><div>DUE DATE _____</div><div>PREPAID CHECK _____</div></div>									
TOTAL									\$140.00

ORIGINAL

Thank You

2nd & PRICE ST. • TRAINER, PA. 19013
(215) 627-7288 (215) 494-8200

SHIPPED VIA _____

[illegible]

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

8826

REC'D BY _____

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014



Zenith PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

62.4
311

21219

PAY
TO THE ORDER OF

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

i/31/ c

AMOUNT

13.000

UNITED STATES GOVERNMENT
OFFICE OF PRICE CONTROL
WASHINGTON, D. C.
OFFICE OF PRICE CONTROL

7: 10.10

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

METRO CONTAINER CORP.

P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

TO:

Zenith Metal
200 Commerce Dr.
Aston, Pa. 19014

NO. 8469

SALESPERSON	DATE OF INVOICE 1/15/86
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	P.P.	F.O.B. POINT
200160		Picked Up			
QUANTITY	CODE	DESCRIPTION			
75		Rubber Gaskets			
ORIGINAL					

TERMS	YOUR ORDER NUMBER
Net	
UNIT PRICE	AMOUNT
.40	\$30.00

VENDOR	RECEIVER
INVOICE	PRICE
NET ACCT.	EXTENSION
REV. DATE	
DISC. %	
GROSS	
DUE DATE	
PREPAID CHECK	

TOTAL \$30.00

Thank You

Metro Container Corporation

2nd & PRICE ST. • TRAINER, PA. 19013

(215) 627-7288 (215) 494-8200

CUSTOMER'S ORDER NO. _____ DATE 1-5-86

NAME Zenith Patel

ADDRESS 200-Commerce Ave

CITY & STATE Astoria, OR ZIP 97103

SHIPPED VIA _____

[illegible]

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

8469

REC'D BY

METRO CONTAINER CORP.

P.O. BOX A
SECOND & PRICE STREETS
TRAINER, PA 19016

WILMINGTON TRUST COMPANY
WILMINGTON, DELAWARE

62-9 50
311

CHECK
20855

PAY Twenty Eight & No/100

TO THE
ORDER OF ZENITH METALS

DATE
4/14/87

AMOUNT
\$28.00

OPERATING ACCOUNT

ZENITH METALS
200 COMMERCE DRIVE
ASTON, PA 19014

Lee M. Neeslan
W. J. Frost
AUTHORIZED SIGNATURE

⑆0311000092⑆ 2364 5386⑈

METRO CONTAINER CORP.

4/14/87

CHECK
20855

INV 2903

gl. 7385

CHECK AMOUNT:

\$28.00

rec'd 4-17-87

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
3/27/81	10804	140.00		140.00
150	TOTALS	140.00		140.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

62-4
311

CHECK
NO.

27375

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

27375

PAY
TO THE ORDER OF

AMOUNT
\$140.00

METRO CONTAINER CORP.
SECOND & PRILE STS
BOX A
TRAINER

PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

METRO CONTAINER CORP.

P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

10804

(215) 485-6100

TO:

Zenith Metal Products
200-Commerce Drive
Highland Industrial Park
Aston PA

SALESPERSON	DATE OF INVOICE
	9/9/86
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	P.P.	F.O.B. POINT	TERMS	YOUR ORDER NUMBER	
201060	9/9/86	Your Truck				Net		
QUANTITY	DESCRIPTION						UNIT PRICE	AMOUNT
20	320	55 Gallon HF Drums					\$7.00	\$140.00
Painted: Black & White								
Exchange for 20 Raw Drums								
ORIGINAL							TOTAL	\$140.00

Thank You

Thank You

Metro Container Corporation

2nd & PRICE ST. • TRAINER, PA. 19013

(215) 627-7288 (215) 494-8200

CUSTOMER'S ORDER NO. _____ DATE 9-9-86

NAME Zenith Metal Products

ADDRESS 200 Commerce Center

CITY & STATE Highland Park, Mich

SHIP ED VIA Air Mail

QUAN	DESCRIPTION	PRICE	AMOUNT
------	-------------	-------	--------

20	5761-HF Aluminum 7"		
----	---------------------	--	--

Painted Black

White

Exchange for 20 Kan-

Aluminum

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

10804

REC'D BY Ed L. Lupton 9-9-86

ZENITH PRODUCTS CORP.

200 COMMERCE DRIVE, ASTON, PENNSYLVANIA 19014

INVOICE DATE	INVOICE NO.	GROSS AMOUNT	CASH DISCOUNT	NET AMOUNT
11/21/65	8199	120.00		120.00
1965	TOTALS	120.00		120.00

 **Zenith** PRODUCTS CORPORATION
200 Commerce Drive, Aston, Pennsylvania 19014

62-4
311

CHECK
NO.

20360

Payable through GIRARD BANK DELAWARE
Wilmington, Delaware
GIRARD BANK
Philadelphia, Pennsylvania

20360

12/13/65

AMOUNT

PAY

TO THE ORDER OF

\$120.00

METRO CONTAINER CORP.
SECOND & PRICE STS
BOX 4
TRAINER PA 19013

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

METRO CONTAINER CORP.
P.O. Box A
Second & Price Streets
TRAINER, PENNSYLVANIA 19016

(215) 485-6100

INVOICE

NO. 8195

TO:

Zenith Metal Products
200 Commerce Drive
Highland Ind. Park
Aston, Pa. 19014

SALESPERSON	DATE OF INVOICE 11/21/85
SHIP TO	

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	P.P.	F.O.B. POINT	TERMS	YOUR ORDER NUMBER																																
200160						Net	0438-266																																
QUANTITY	CODE	DESCRIPTION					UNIT PRICE	AMOUNT																															
8	10	55 Gallon HF Drums					\$15.00	\$120.00																															
		PAINTED GREEN																																					
<div data-bbox="876 1381 1518 1696" data-label="Form"> <table border="1"> <tr> <td>VENDOR</td> <td>1111</td> <td>RECEIVER</td> <td></td> </tr> <tr> <td>INVOICE</td> <td>8195</td> <td>PRICE</td> <td></td> </tr> <tr> <td>G/L ACCT.</td> <td>1111</td> <td>EXTENSION</td> <td></td> </tr> <tr> <td>INV. DATE</td> <td>11/21/85</td> <td></td> <td></td> </tr> <tr> <td>DISC. %</td> <td></td> <td></td> <td></td> </tr> <tr> <td>GROSS</td> <td>120.00</td> <td></td> <td></td> </tr> <tr> <td>DUE DATE</td> <td>12/15/85</td> <td></td> <td></td> </tr> <tr> <td>PREPAID CHECK</td> <td></td> <td></td> <td></td> </tr> </table> </div>						VENDOR	1111	RECEIVER		INVOICE	8195	PRICE		G/L ACCT.	1111	EXTENSION		INV. DATE	11/21/85			DISC. %				GROSS	120.00			DUE DATE	12/15/85			PREPAID CHECK					
						VENDOR	1111	RECEIVER																															
INVOICE	8195	PRICE																																					
G/L ACCT.	1111	EXTENSION																																					
INV. DATE	11/21/85																																						
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GROSS	120.00																																						
DUE DATE	12/15/85																																						
PREPAID CHECK																																							
<div data-bbox="673 1732 917 1795" data-label="Text"> <p><i>Thank You</i></p> </div>						TOTAL	\$120.00																																

ORIGINAL

2nd & PRICE ST. • TRAINER, PA. 19013
(215) 627-7288 (215) 494-8200

SHIPPED VIA 5/25/13

[illegible]

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

8195

REC'D BY

CLARK LADNER

FORTENBAUGH & YOUNG

ATTORNEYS AT LAW

32nd Floor ■ 1818 Market Street ■ Philadelphia, PA 19103 ■ (215) 241-1800 ■ Cable: CLARKLAD ■ Telex: 83-1462 ■ Telecopier: (215) 241-1857

Jeffrey A. Smith
(215) 241-1895

M E M O R A N D U M

NEW JERSEY OFFICE
One Centennial Square
Haddonfield, NJ 08033
(609) 429-5351

TO: Metro Container Corporation Non-Participating PRPs
FROM: Jeffrey A. Smith
DATE: August 17, 1988
RE: Group Membership

As Chairman of the Interim Steering Committee for the Metro Container site PRPs, I am writing to urge your participation in the Group, for both strategic planning and financial support.

Several unique aspects of this site appear to make it ideal for creative and decisive group decision-making to minimize the possibility of lengthy and costly EPA enforcement actions. First, the owner/operator of the site is reorganizing under Chapter 11 of the Bankruptcy Code. It is important to have PRP participation in this process to ensure that the rights of Metro's customers -- most of whom are among the PRP's -- are adequately protected. Second, Region III of EPA has been willing, up to this point, to cooperate with Group efforts to evaluate the site and determine what, if any, responsibility for cleanup belongs to Group members. It is important to capitalize on this window period of willingness to avoid adversarial action in the future. Finally, the Group has engaged a consulting engineer to evaluate the site more thoroughly and prepare a work plan for cleanup. Your participation in this phase may significantly shape the nature of your future responsibilities at the site.

CLARK, LADNER, FORTENBAUGH & YOUNG

Metro Container Corporation
Non-Participating PRPs
August 17, 1988
Page Two

I urge you to read Bill Streets' letter and the proposed Group Agreement which were forwarded to you about a month ago. If you have any questions, please do not hesitate to give me a call, as many of you already have. If you plan to participate in the Group, the sooner, the better. If you had planned not to participate in the Group, I hope that you will reconsider that decision.

Very truly yours,

Jeffrey A. Smith

JAS/jc

**CLARK
LADNER**

FORTENBAUGH & YOUNG

32nd Floor @ 1818 Market Street @ Philadelphia, PA 19103

Zenith Products
A. James Pruffe, President
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014
Attn: Briggs Fletcher



LAW OFFICES OF

SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

PHILADELPHIA PA 19102

(215) 972-7777

CABLE ADDRESS: BIDEAL
TELECOPIER (215) 972-7725
TWX 83-4798

55 VALLEY STREAM PARKWAY
SUITE 330
GREAT VALLEY CORPORATE CENTER
MALVERN PA 19355
(215) 251-5050

PLAZA 1000
SUITE 604
EVESHAM AND KRESSON ROADS
VOORHEES NJ 08043
(609) 424-0098

222 DELAWARE AVENUE
P. O. BOX 1266
WILMINGTON DE 19899
(302) 654-1413

1901 L STREET, N. W.
SUITE 700
WASHINGTON, D. C. 20036
(202) 223-7660

TWENTY-FIRST FLOOR
237 PARK AVENUE
NEW YORK NY 10017
(212) 551-3502

DIAL DIRECT (215)

972-7171

February 3, 1989

TO: Metro PRPs

We represent five companies who are in the process of preparing a scope of work for emergency removal action at the Metro Container site in Trainer, Pennsylvania. This scope of work will be developed in consultation with Pennsylvania Department of Environmental Resources and EPA personnel. If agreement is reached, we expect the scope of work to be embodied in an administrative consent order under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 et seq.

In 1988 EPA sent information request letters to a number of companies identified as possible customers of Metro Container Corp. An EPA contractor is using the responses to that request and Metro Container's records to develop a comprehensive list of entities involved at the site. That work product is expected to be available in early February, which is about the time when the proposed scope of work will be completed.

If agreement can be reached with EPA and/or DER concerning the scope of work, our office will be in contact with those companies identified by EPA as Metro Container customers. On behalf of the five companies presently involved, we plan to solicit financial participation on an equitable basis. Information received to date suggests that your company is likely to be among those we contact.

Please give me a call if you are interested in participating in our group or if you have any questions.

Sincerely,

Carl B. Everett
Carl B. Everett

CBE/mml

LAW OFFICES OF
SAUL, EWING, REMICK & SAUL
3800 CENTRE SQUARE WEST

55 VALLEY STREAM PARKWAY
SUITE 330
GREAT VALLEY CORPORATE CENTER
MALVERN PA 19355
(215) 251-5050

PLAZA 1000
SUITE 664
EVESHAM AND KRESSON ROADS
VOORHEES NJ 08043
(609) 424-0080

PHILADELPHIA PA 19102

(215) 972-7777

CABLE ADDRESS BIDSAL
TELECOPIER (215) 972-7725
TWX 83-4798

222 DELAWARE AVENUE
P. O. BOX 1266
WILMINGTON DE 19899
(302) 654-1413

1901 L STREET, N. W.
SUITE 700
WASHINGTON, D. C. 20036
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Please give me a call if you are interested in participating in our group or if you have any questions.

Sincerely,

Carl B. Everett
Carl B. Everett

CBE/mm1



BP America Inc.
200 Public Square, 39-5300-B
Cleveland, Ohio 44114-2375
216 586-4141

Law Department

BP AMERICA

June 16, 1988

See Attached Distribution List

Re: Metro Container Site

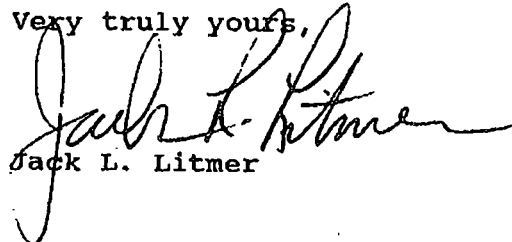
Dear Sir/Madam:

Many of you have been contacted by telephone about an initial PRP meeting concerning the Metro Container Site. We expect to have a representative from USEPA present to discuss the Site. The meeting is scheduled for 10:00 am, Tuesday June 21, 1988 at the following address:

DuPont
1007 Market Street
Wilmington, Delaware
Room 7015A

If you need additional information, please contact me at (216) 586-6598 or Pamela Meitner at (302) 774-8720.

Very truly yours,


Jack L. Litmer

Litm0046.mem
Attachment

DISTRIBUTION

*Atlantic Refining & Marketing Corp.
Thomas S. Stammel, Esq.
1016 West Ninth Avenue
King of Prussia, PA
P.O. Box 1050
Southeastern, PA 19398-1050

Zenith Products
Attn: Briggs Pletcher
200 Commerce Drive
I-95 Industrial Park
Aston, PA 19014

*Chevron Corporation
Daniel E. Vineyard, Esq.
555 Market Street
San Francisco, CA 94120-7141

*Tunnel Barrel and Drum
c/o Philip Saginario, Esq.
50 Galesi Drive
Wayne, NJ 07470

Thomas S. Lodge, Esq.
Connally, Bove, Lodge, & Hutz
1220 Market Building
P.O. Box 2207
Wilmington, DE 19899

*USX Corporation
Leo M. Pruett, Esq.
600 Grant Street
Pittsburgh, PA 15230

Metro-Enterprises Container Corp.
Sidney Levy
2nd & Price Streets
Trainer, PA 19013

Mobile Oil Corporation
*William Streets, Esq.
3225 Gallows Road
Fairfax, VA 22037-0001

Jeffrey A. Smith, Esq.
Clark, Ladner, Fortenbaugh & Young
1818 Market Street, 32nd Floor
Philadelphia, PA 19103

Wall & Makowski
Kevin Wall, Esq.
407 White Horse Pike
Oaklyn, NJ 08107

*Sun Refining & Marketing Company
James A. Rosen, Esq.
Ten Penn Center
1801 Market Street
Philadelphia, PA 19103-1699

Wm Stevenson Co
Century Paint

*Nancy M. Ware, Esq.
Schnader, Harrison, Segal & Louis
1600 Market Street, Suite 3600
Philadelphia, PA 19103

Westinghouse Electric Corporation
John A. Ristuccia
Dutton Mill Center
800 West Dutton Mill Road
Aston, PA 19014

*Witco Chemical Corporation
Samuel Thomas, Plant Manager
3300 West 4th Street
Trainer, PA 19013

Name	Company	Phone
James L. Patton, Jr.	Metro Container	(302) 571-6654
Young Conrad / Stewart + Taylor	Metro Enterprise	
William C. Stroets	Mobil Oil Corporation	(703) 849 4143
Nancy M. Ware	W.N. Stevenson Company	(215) 751-2084
DANIEL E. VINEYARD	CHEVRON CORP.	(415) 894-3149
F. RAYMOND ANGUS	WITCO CORP	215 - 494-3561
Briggs Fletcher	Zenith Products	(215) 485-4700 (245)
Ladonna Mahedra Cawlor	Rohm & Haas.	(215) 592-3451
Larry Falkin	EPA	215 597-6679
Diane A.	EPA - Office of Regional Counsel	215 597-8905
Ellen Friedell	Rohm and Haas Company	215-592-2582
PAC REFINER	COFANTO	302 774 8520
LINDA HAHN	SUN REFINING & MKTG. CO.	215-991-3718
GENE CAPALDI	ARCO CHEMICAL	215-359-2003
LEO M. PRUETT	USX Corp.	(412) 433-2838
Mitchell E Burack	Pepper Hamilton & Schaefer for Sentry Paint Tech.	(215) 893-3075
Philip Sogin	Tennant / Barrett	301-890-747
Anthony Luman	Tennant / Barrett	201-933-1444
William J. Wall	Quality Control Inc.	609-838-0355
AF Smith	CURE LABOR. FOR TENSILE Young & Rubicam and Reit	(215) 241-1895

Elaine Simpson BP Oil Co. - Marathon ^{Refinery} (215) 499-7044

Jack Citron BP America Cleveland 216-586-6598

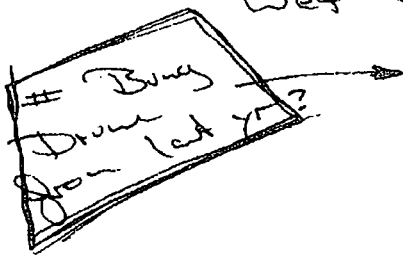
Metro
C/21

11 acres = 20 yrs / Business (1969) 69-83 - Universal Cont Corp

2 reprocessing lines

metro cont → Wet = Bung Drums (Acid / Base) Bath

metro Ext → Dry = Burn out interiors = Open head drums
↓
Still operational Rinse / Paint / Recondition / Sell



Wet Process: produces sludge - acid / Base +
Sludge from Drum - x 1 yr ago treatment stage -
~ 1000 55 gal drums of sludge
Surface impoundment

= 30-40 k Drum awaiting reconditioning
3-4 x 10 Treatment Tanks

Incinerator develops ash w/ Heavy Metals - Don't
know of any drums with ash - possible

⊗ Ash - Goes offsite via Dumpster
↳ Sumpter land fill in Michigan

— Active leachate seeps on Bank to Stony Creek

May / May not be in compliance with Reg's on
Incinerator

Ayco 17
 BP 18.7
 Chevron 201
 D.P. 25
 T. & T. 20
 Shell 15
 JTM 48
 Lightner 17
 Mobil x 250
 Norton 15
 Q. Container 15
 Bob O'Donnell 50
 Tunnel 92
 W N Stevens 42
 Con O: 11

837
 here above

Figures from
 Company

Mexico

ARCO 2600
 W. Arco 7200
 USX 3400
 Sun - 3 - 17
 Raw Hous 30k
 D.P. 41k

Zenith to

Mexico 1200?

Why not 600?

Invoiced / Truckloads

List from Metro - Do not know of foundation
for deriving list \approx 70 companies - may grow

EPA beginning to get an idea of volumetric shares



- Possibility of Metro Doing cleanup -

Will not distinguish between wet/dry process
generators yet - may occur later

Immediate Stabilization - "Fence access, burn to prevent
runoff, & leachate intercept"

Complete Removal - "Removal of all waste, and
grossly contaminated soil, leachate
intercept along creek bank."

\approx 20 companies that have sent 10K + Drum
3-4 " " " " " 100K + Drum

10-15   companies in the less than 1000

EPA est. 1.8 million to cleanup (EPA Done)

Metro est. \$500,000 to cleanup (Privately Done)

EPA Has $\$170$ w/ Reimburse, Court for full cleanup
costs + administrative costs

Within Trust hold. collateral agreement



Metro Container Corp

POST OFFICE BOX A

SECOND & PRICE STREETS

TRAINER, PENNSYLVANIA 19016

(215) 485-6100 TELEPHONES (215) 485-6100



<u>SUPPLIER OF DRUMS</u>	<u>QUANTITY</u>	<u>ADDRESS</u>	<u>TRANSPORTER</u>	<u>ADDRESS</u>
AFCO		81 Commercial Ave. Avenel, NJ 07001	AFCO	Same
Gilbert Spruance Co.	4,708	Richmond & Tioga Phila., PA 19134	AMF Co.	81 Oak Forrest Rd. Sicklerville, NJ 0808
AMF Co.		81 Oak Forrest Rd. Sicklerville, NJ 08081	AMF Co.	Same
AMTRAK Receiving Dept.		Foot of Vandevere Ave. Wilmington, DE 19801	AMF Co.	See above
ARCO Chemical Co.		3801 W. Chester Pk. Newtown Sq., PA 19073	AMF Co.	See above
Atlantic Refining & Marketing		3144 Passyunk Ave. Phila., PA 19145	AMF Co.	See above
Autoline Lubricants	1,207	900 S. Carolina St. Baltimore, MD 21231	AMF Co.	See above
E. C. Barnes Inc.		8632 Lincoln Way, W. St. Thomas, PA 17252	E.C. Barnes	Same
Callahan Chemical Co.	3,554	Broad & Filmore Ave. Palmyra, NJ 08065	AMF Co.	See above
Capitol Lubricants		569 Industrial Dr. Lewisberry, PA 17339	AMF Co.	See above
Chevron	22,143	P. O. Box 7408 Phila., PA 19101	Willey	410 W. Oak Lane Glenolden, PA 19036
Conestoga Fuel	473	1145 Elizabeth Ave. Lancaster, PA 17607	AMF Co.	See above
Conestoga Foundry	249	P. O. Box 464 Hamburg, PA 19526	AMF Co.	See above
Wm. H. Cooper & Sons	18,796	320 Brown Street Phila., PA 19133	Cooper	Same
First State Steel Drum Co.		New Castle Ave. New Castle, DE 19720	First State	Same
Flippo Oil		3030 S. Main St. Harrisonburg, PA 22801	Flippo Oil	Same

<u>SUPPLIER OF DRUMS</u>	<u>QUANTITY</u>	<u>ADDRESS</u>	<u>TRANSPORTER</u>	<u>ADDRESS</u>
Fritch Fuel Co.	7,093	116 River St. Bethlehem, PA 18015	AMF Co.	See above
Jay Gress		P. O. Box 628 Norristown, PA 19404	Jay Gress	Same
C. B. Hooper & Sons		Main Street Intercourse, PA 17534	C. B. Hooper	Same
Industrial Solvents	2,149	RD #1 Box 511 York Haven, PA 17370	AMF Co.	See above
J T M Drum		P. O. Box 169 Sayerville, NJ 08872	J T M Drum	Same
Wm. Jones & Sons, Inc.		230 Liberty St. Camden, NJ 08401	Wm. Jones	Same
Donald Kelly	3,168	2008 Federal St. Camden, NJ 08105	Donald Kelly	Same
Kessler Chemical		270 Street Road New Hope, PA 18938	AMF Co.	See above
E. J. Koenig	958	P. O. Box 200 Bordentown, NJ 08505	AMF Co.	See above
Lehigh Gas & Oil	356	Main Street Beaver Meadows, PA 18216	Lehigh Gas	Same
Lightman Drum Co.	464	P. O. Box 22 Berlin, NJ 08009	Lightman Drum	Same
Mauger & Co., Inc.		1015 Baltimore Pk. Media, PA 19063	Mauger & Co.	Same
Lyondell Petrochemical		P.O. Box 75007 Accounts Payable Los Angeles, CA 90075	AMF Co.	See above
Mobil Oil Co.	94,441	P. O. Box 428 Paulsboro, NJ 08066	Mobil Oil Co. AMF Co.	Same See above
National Solvents	3,223	8735 Route 13 Tullytown, PA 19007	AMF Co.	See above
Norton Petroleum	1,063	290 Possum Park Rd. Newark, DE 19171	AMF Co.	See above
Robert O'Donnell	7,348	607 Wynne Rd. Springfield, PA 19064	O'Donnell	Same
Petroleum Products		900 Eisenhower Blvd. Harrisburg, PA 17105	AMF Co.	See above

<u>SUPPLIER OF DRUMS</u>	<u>QUANTITY</u>	<u>ADDRESS</u>	<u>TRANSPORTER</u>	<u>ADDRESS</u>
Pioneer Oil Co.		61st & Passyunk Ave. Phila., PA 19153	AMF Co.	See above
Petrolite Corp.		4th & Saville Ave. Eddystone, PA 19013	AMF Co.	See above
Quality Container Corp.	1,626	Trenton & Ontario Sts. Phila., PA 19134	Quality Cont.	Same
Reit Lubricants	1,499	899 Mearns Rd. Warminster, PA 18974	AMF Co.	See above
Reliable Recyclers		P. O. Box 4 Smoketown, PA 17675	Reliable	Same
Rhodes Drums		2000 Federal St. Camden, NJ 08105	Rhodes Drums	Same
Sentry Paint & Chemical		P. O. Box 269 Darby, PA 19023	AMF Co.	See above
Scot Lubricants	3,044	1715 E. Tremont Allentown, PA	AMF Co.	See above
Sunolin		P. O. Box 609 Claymont, DE 19703	AMF Co.	See above
W. N. Stevenson	10,600	246 Rockhill Rd. Bala Cynwyd, PA 19004	AMF Co.	See above
Sun Oil Co.	7,189	P. O. Box 395 Marcus Hook, PA 19064	AMF Co.	See above
Sun Transport		P. O. Box 2225 Aston, PA 19104	AMF Co.	See above
Superior Drum	2,863	218 Crafton Ave. Pitman, NJ 08071	Superior	Same
Tasty Baking Co.		2801 Hunting Park Ave. Phila., PA 19129	AMF Co.	See above
Herb Toy, Inc.	1,076	Box 200 Franklinville, NJ 08322	Herb Toy	Same
Tunnel Barrel & Drum		85 Triangle Blvd. Carlstadt, NJ 07072	Tunnel Barrel	Same
U. S. Steel Corp.		Fairless Works Fairless Hills, PA 19047	AMF Co.	See above
J. T. Warring & Sons	480	4545 S Street Capitol Hgts., MD 20743	Warring	Same

<u>SUPPLIER OF DRUMS</u>	<u>QUANTITY</u>	<u>ADDRESS</u>	<u>TRANSPORTER</u>	<u>ADDRESS</u>
Westinghouse Electric		600 W. Dutton Mill Rd. Aston, PA 19014	AMF Co.	See above
Witco Chemical Co.		3300 West 4th St. Trainer, PA 19013	AMF Co.	See above
Zenith Metal Products		200 Commerce Drive Highland Ind. Park Aston, PA 19014	AMF Co.	See above
Zurn Oil	4,019	2736 N. Broad St. Phila., PA 19132	AMF Co.	See above
BP Oil Co.	4,556	P. O. Box 428 Marcus Hook, PA 19016	AMF Co.	See above

June 29, 1988

TO: All Notified PRP's

METRO CONTAINER SUPERFUND SITE
2nd & Price Street
Trainer, Pennsylvania

On June 21, 1988, fifteen notified PRP's met at Dupont's offices in Wilmington, Delaware to hear EPA's presentation concerning the Trainer, Pennsylvania Superfund site and to discuss what action, if any, the notified PRP's might consider to be of mutual benefit in regard to this site.

The EPA reported that the site, presently the location of an operating (under Bankruptcy Chapter 11) drum reconditioner, is an immediate danger due to hazardous wastes being stored on the property in such a manner as to leach into the Delaware River with each rainfall. EPA proposes to require the PRP's to remove these wastes and any contaminated soils. Metro Container states that it is without sufficient funds to pay for the needed removal project, which is now estimated to cost between 1 and 2 million dollars.

By the close of the meeting, an interim Steering Committee had been appointed and charged with the responsibility of drawing up a short term PRP agreement, contacting EPA concerning immediate future actions by EPA, retaining a consulting engineer to conduct a preliminary survey of the site, and arranging a general meeting of all notified PRP's.

Enclosed is a copy of the Interim PRP Agreement. You will note that it runs for an indefinite period subject to action by the Steering Committee. Initially it is intended that the PRP's joining the interim Steering Committee will be bound for only 90 days since we believe that within this 90 day period, we can obtain the engineering consultant's report, determine whether the site is as reported, and if so, what can be done to remedy the problems and at what cost. We also believe we can, within the same 90 days, schedule a general PRP meeting and decide whether a permanent PRP Steering Committee should be formed and, what form it should take. All of this is contingent upon at least fifteen companies electing to join the interim Steering Committee. In the event the group determines that it will be worthwhile to continue a joint

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effort beyond the 90 days, the agreement will continue in effect beyond the interim 90 day period for those companies wishing to continue or join a permanent Steering Committee.

Further, the Interim Steering Committee has been charged with preliminary legal research regarding bankruptcy questions and other legal concerns in relation to Metro Container, it's subsidiaries and with Wilmington Trust Company (which is the present holder of Metro's accounts receivable, mortgages, and other security).

It is proposed to fund two projects (the consultant's survey of the site, and the legal research). Each Notified PRP is invited to enter into the Interim PRP Agreement and contribute \$1,000 towards the group effort. The \$1,000 assessment should be made payable to Jeffrey A. Smith, Esquire, Chairman, Interim PRP Steering Committee, 1818 Market Street, Philadelphia, Pennsylvania 19101, Tax I.d. No. 23-1425714, and it should accompany the signed counterpart signature page of the Steering Committee Agreement. If the group decides it would be best served by a joint approach to the removal project, this payment will be credited towards future PRP Steering Committee assessments which will, we believe, be determined by a proportionate method (such as volume contributed or some other equitable method) assuring that the greatest amount of the costs are assumed by those who contributed the greatest amount of waste. We are told that in addition to the 73 noticed PRP's that there are other non-noticed PRP's; however, the noticed PRP's represent as much as 80% of the contributed volume.

It is our impression that EPA Region III is willing to work with a responsible PRP Steering Committee. We also believe that if such a group is not formed, that each of us can expect EPA to issue an administrative Order by mid-summer requiring each company to undertake the removal project.

We believe it is to every Notified PRP's advantage to join this initial investigatory effort, since it is unlikely that any Interim Steering Committee member will be subject to early EPA administrative action and that each Interim Steering Committee member will obtain additional information to assist in making an informed decision concerning the benefits of future mutual efforts.

06.29.88 11:07 AM MOBIL FAIRAX

F04

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If you have any questions, please contact any member of the PRP Interim Steering Committee (listed below). We would ask you to reply to Jeff Smith (whether you elect to join this Interim Steering Committee or not) by July 15, 1988.

Very truly yours,

METRO-CONTAINER INTERIM
STEERING COMMITTEE

Chairman
Jeffrey A. Smith, Esq.
Clark, Ladner, Fortenbaugh and
Young
32nd Floor
1818 Market Street
Philadelphia, PA 19103
Tel: (215) 241-1895

Vice Chairman
Kevin F. Wall, Esq.
Wall & Makowski
407 Whitehorse Pike
Oaklyn, NJ 08107
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200 Public Square, 39-5300-3
Cleveland, OH 44114
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Leo M. Pruett, Esq.
USX Corporation
600 Grant Street, Suite 1538
Pittsburgh, PA 15230
Tel: (412) 433-2838

William C. Streets, Esq.
Mobil Oil Corporation
3225 Gallows Road
Fairfax, VA 22037
Tel: (703) 849-4143

Daniel Vineyard, Esq.
Chevron
555 Market Street
San Francisco, CA 94120
Tel: (415) 894-3149

WCS/lam
Enclosure
9256m/87

Metro Container Corporation/PRP
PARTICIPATION AGREEMENT

WHEREAS, several companies and individuals have received a letter from the United States Environmental Protection Agency (USEPA) indicating that they are Potentially Responsible Parties ("PRPs") pursuant to the Comprehensive Environmental Response Compensation and Liability Act of 1980, and its amendments, ("CERCLA") for conditions at the Metro Container Corporation site in Trainer, Pennsylvania ("Site"); and

WHEREAS, the PRPs recognize that there are substantial efficiencies in responding to the site on a cooperative basis; and

WHEREAS, the PRPs desire to establish a Steering Committee to coordinate their joint efforts; and

WHEREAS, the PRPs desire to make a coordinated and timely response to the Notice issued by USEPA requiring an Emergency Removal Action at the Site;

WHEREAS, the PRPs recognize that many other companies and individuals have utilized, directly or indirectly, the site for drum or barrel reclamation and have not yet been named as PRPs by USEPA; and

2. are we res? they incur #
WHEREAS, the Steering Committee will incur certain expenses on behalf of all PRPs ("Steering Committee Expenses") and the PRPs must raise sufficient funds to pay such expenses;

WHEREAS, the PRPs recognize that they desire to avoid litigation amongst themselves and arrive at an allocation with participation by all PRPs, including those PRPs yet to be named, within the context of this Agreement.

NOW, THEREFORE, in consideration of the foregoing and the promises and covenants contained herein, the participating PRPs agree as follows:

1. The PRPs who are parties to this Agreement shall be the "Participating PRPs". The Participating PRPs hereby establish a Steering Committee which shall be responsible for directing the joint efforts of the Participating PRPs under this Agreement. The Steering Committee shall report in writing its decisions, actions and recommendations to the Participating PRPs from time to time as may be necessary to keep the Participating PRPs informed of matters relevant to this Agreement.

2. Membership on the Steering Committee shall initially be open to any Participating PRP who expresses a willingness to make its representative available to actively participate in the Steering Committee. The membership of the Steering Committee shall be communicated to the Participating PRPs. After initial

formation of the Steering Committee, membership on the Steering Committee may be expanded or members may be removed by the Steering Committee as it deems, in its sole discretion, appropriate to achieve the purposes of this Agreement.

3. It shall be the objective of the Steering Committee to make decisions based on the consensus of its members. When this is not possible, the Steering Committee shall decide matters by majority vote. Until an allocation is determined, each member shall have one vote.

4. The Steering Committee shall communicate and conduct negotiations with USEPA for the purpose of Responding to the Notice issued by USEPA requiring an Emergency Removal Action at the Site. Each Participating PRP reserves the right to independently determine whether it will participate in such agreement and the Steering Committee is not authorized to commit or bind any Participating PRP to such an agreement.

5. The Steering Committee shall develop and recommend a Funding Agreement based on an allocation developed by the Steering Committee. It is contemplated that the allocation and Funding Agreement shall fund the work of the Steering Committee through the completion of the Emergency Removal Action and the Participating PRP contribution set forth in paragraph 9 shall be taken into account for any funding agreement developed by the Steering Committee. However, Participating PRPs are not

committing to any allocation or funding agreement at this time. Further, each Participating PRP reserves the right to independently determine whether it will participate in such funding agreement for the Emergency Removal Action and the Steering Committee is not authorized to commit or bind any Participating PRP to such funding agreement.

6. The Steering Committee shall be empowered to define the scope of work for, retain the services of, and contract with competent and qualified technical, legal and/or investigative consultants to assist the Steering Committee in its endeavors. Specifically, but not to the exclusion of other consultants, the Steering Committee shall be empowered to make arrangements for the retention of consultants to assist in the development and implementation of an acceptable work plan to the Emergency Removal Action and to assist in the development of an allocation and a funding agreement.

7. Each Participating PRP agrees that all information, documentation, records and communications received pursuant to this Agreement shall be held in strict confidence by the Participating PRP and shall be used only in connection with attaining the purposes of this Agreement. The Participating PRPs intend to protect from disclosure all shared information, documentation, records and communications as a result of this Agreement to the greatest extent permitted by law regardless of whether the sharing

occurred before execution of this Agreement or thereafter. Notwithstanding the foregoing, this duty to maintain confidentiality shall not bar any Participating PRP from disclosing information it may be required to disclose under law or to an insurer under a duty to cooperate in providing claim information. Each Participating PRP agrees to advise its representatives of the terms of this Agreement with regard to confidentiality and take steps to assure that such representatives maintain such confidentiality. The Steering Committee shall make any consultants whose services it secures aware of this Agreement with regard to confidentiality and take steps to assure that such consultants maintain such confidentiality.

Establish Trust Fund

8. The Steering Committee shall establish a trust and/or escrow fund through the offices of Clark, Ladner, Fortenbaugh & Young, Attorneys at Law, and shall deposit all monies received from Participating PRPs into said fund. The Steering Committee shall adopt procedures for the authorized payment of Steering Committee Expenses. The Steering Committee shall provide an accounting of the funds to the Participating PRPs from time to time and as requested and at the termination of this Agreement. All monies provided by Participating PRPs pursuant to this Agreement shall be used solely for Steering Committee Expenses.

Payment \$1000

9. Each Participating PRP shall as promptly as possible and in any case within seven (7) days of executing the "Metro

Container Corporation Participating PRP Signatory Page" deliver to the Steering Committee a check made payable to the Clark, Ladner, Fortenbaugh & Young, Trust Account, in the amount of one thousand dollars, \$1,000.00. Delivery to the Steering Committee shall be deemed complete upon mailing of such check to the following:

Jeffrey A. Smith
Attorney at Law
Clark, Ladner, Fortenbaugh & Young
32nd Floor
1818 Market Street
Philadelphia, PA 19103

10. Additional PRPs upon becoming signatories to this Agreement will be assigned by the Steering Committee to an appropriate monetary obligation based on the information then available. The Steering Committee may require a late membership surcharge as a condition to becoming a Participating PRP at any time after fourteen (14) days of the effective date of this Agreement. Additional parties shall be bound to all of the terms and conditions of this Agreement.

11. It is the intent of the Participating PRPs that PRPs of the Metro Container Corporation site that do not ultimately participate in funding of the emergency response costs be sued for their respective liabilities of this site by EPA and/or the PRPs that do fund such work.

12. Each Participating PRP agrees to be contractually bound by the terms of this Agreement and agrees any breach of this Agreement may be enforced by litigation. Any party found to be in

breach shall be responsible for court costs, expenses and attorney fees with respect to that enforcement proceeding.

13. The Participating PRPs agree that this Agreement shall be capable of modification. Such modification shall only be effective upon execution of a written modification by a majority of the Participating PRPs. Participating PRPs which do not execute the written modification shall not be bound by the modification but such non-executing parties shall be deemed to have voluntarily withdrawn from this Agreement. Participating PRPs voluntarily withdrawing from this Agreement shall not be entitled to a refund of the monetary obligation and shall remain liable for the monetary obligation set forth in Paragraph 9.

14. This Agreement shall terminate upon action by the Steering Committee to terminate this Agreement. However, the Participating PRPs specifically agree that the confidentiality and non-discoverability of the investigation shall survive termination of the Agreement or the withdrawal of any Participating PRP.

15. This Agreement shall become effective upon the latter of June , 1988 or the execution of the "Participating PRP Signatory Page" by any two Participating PRPs. Executed Participating PRP Signatory Pages are to be mailed to the following:

Jeffrey A. Smith
Attorney at Law
Clark, Ladner, Fortenbaugh & Young
32nd Floor
1818 Market Street
Philadelphia, PA 19103

or such other address as the Steering Committee shall designate. Execution of the Participation PRP Signatory Page or a photocopy of such document shall bind each signing party to abide by the terms of this PRP Participation Agreement. The chairman of the PRP steering committee shall be the custodian of the signatory pages and shall report to the Participating PRPs the names and numbers of Participating PRPs.

16. It is understood and agreed that participating in this Agreement and any associated joint effort is in no way to be construed to be an admission with respect to any fact, responsibility, fault or liability in connection with the Site.

17. This Agreement constitutes the entire understanding of the members with respect to its subject matter.

METRO CONTAINER CORPORATION
PARTICIPATING PRP SIGNATORY PAGE

_____ hereby enters into and agrees to
be bound by the PRP Participation Agreement. The undersigned rep-
resents and warrants that he or she is duly authorized to enter
into this Agreement on behalf of the company or entity on whose
behalf it is indicated he or she is signing.

By: _____

Dated: _____

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